



HegartyMaths and GDPR

HegartyMaths takes the privacy of all our students and teachers very seriously and as such we wanted to give you an update on our preparations for the General Data Protection Regulation (GDPR).

Below is an update to our March statement detailing what steps we are taking to meet the requirements of GDPR in time for the 25th May 2018.

This statement has been updated on the 23rd April 2018.

GDPR Compliance Project

Alongside our Data Protection Consultants at Bruce and Butler we have:

- Documented the processing activities undertaken by HegartyMaths as well as our legal basis of processing the personal data and any special category personal data held throughout our organisation.
- Sought guarantees from all of the third parties who are processing personal data on behalf of HegartyMaths.
- Reviewed how we are transparent with the users of the HegartyMaths platform and implemented changes to this.
- Begun approaching those schools whose students' and teachers' personal data we are currently processing to demonstrate our accountability for that processing and update our terms with them.

As our preparations are continuing in the move towards May 25th, our project will include:

- Ensuring that all schools whose students' and teachers' personal data we are processing are approached with those updates to our terms with them.
- The continued reviewing and updating of all policies and procedures relating to the use of personal data.
- Ensuring we have robust mechanisms for individuals to enforce their data subject rights at HegartyMaths.
- Ensuring all privacy notices are up to date and clearly accessible to all users of HegartyMaths.
- Appointing a Data Protection Officer at HegartyMaths.

As we move towards the 25th May 2018 we will keep all users up to date in relation to our progress towards compliance.

Any questions?

We know you have questions about how we are continuing to prepare for GDPR, and we know how important those questions are. As such, we have collated some of your most frequent questions and our answers below.



Your questions and our answers

1. I want HegartyMaths to complete a form or respond to a letter about their guarantees for my schools processing, can you do this?
 - a. We understand your school's requirement to seek sufficient guarantees from their Data Processors for the continued processing of personal data. Several schools have sent us templates that they wish us to complete, but we have another solution! We have prepared an updated Data Sharing Agreement which details our position on the processing of the personal data you entrust to us. So, if you're going through your preparations for GDPR and haven't yet received this document, please contact us using the email address below with the subject line: [School name]/Data Sharing.

2. Where is our personal data stored?
 - a. Personal Data about your pupils which is being processed by HegartyMaths is stored securely in Cloud Servers held in London with that personal data backed-up to further Cloud Servers in Dublin – your pupils' personal data is not stored outside of the EU.
 - b. For the most part, personal data relating to School Staff is stored in the same way as pupils at HegartyMaths. Some personal data is stored with third party suppliers outside of the EU that have provided us guarantees of their data protection measures, these parties are services ancillary to the education platform such as our accounting package, CRM, and communications providers.

3. What security measures are in place to protect personal data?
 - a. We ensure that there are sufficient measures, on both a technical and organisational levels to maintain our information security. These measures include secure SSL encryption for data uploads and access only via SSH protocols. We ensure all machines are secured, password protected and up to date with their antivirus and firewalls. Access to personal data is controlled only to those staff who need it with training for all of our team being undertaken.

4. Does HegartyMaths backup the personal data?
 - a. Absolutely. Our back up is also held with the European Union in Cloud Servers based in Dublin.

5. What third party agreements do you have in place?
 - a. We have a number of agreements with the third parties who process personal data on our behalf. These vary in their make-up but all have been assessed for GDPR with guarantees of their preparations being sought from all.

6. How should I get my pupils or their parents to consent to their data going to HegartyMaths?
 - a. You won't need to! The use of HegartyMaths does not rely on an individual's consent as we do not believe that consent is the most relevant legal basis to process your pupils' and teachers' personal data.

If you have any further questions about the above or GDPR more generally we would love to hear from you. To get in contact please email us at: privacy@hegartymaths.com