HegartyMaths and Data Protection

HegartyMaths takes the privacy of all our registered students and teachers very seriously and as such we wanted to explain the work we have undertaken in order to adhere to Data Protection Legislation (the Data Protection Act 2018 and the General Data Protection Regulation).

This statement has been updated on the 4th June 2019.

Data Protection Officer

HegartyMaths has appointed Bruce & Butler Limited as its Data Protection Officer (DPO). If you need to contact our DPO, you can do so using privacy@hegartymaths.com.

GDPR Compliance Project

As part of our ongoing commitment to upholding the Data Protection Principles, we have:

● Documented the processing activities undertaken by HegartyMaths as well as our legal basis of processing the personal data and 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 and, where appropriate, entered into Data Processing or Data Sharing Agreements;

● Ensured that all schools whose students’ and teachers’ personal data we are processing have been provided with, and signed a copy of, our Data Handling Agreement;

● Implemented processes to ensure that HegartyMaths’ policies and procedures are reviewed regularly so they are accurate;

● Ensured we have robust mechanisms for individuals to exercise their data subject rights at HegartyMaths;

● Ensured all Privacy Notices are up to date and clearly accessible to all users of HegartyMaths.

Any questions?

We know you have questions about how HegartyMaths process personal data, and we know how important those questions are. As such, we have collated some of your most frequently asked questions and provided our answers below.
FAQs

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 that schools have a requirement to seek sufficient guarantees from their Data Processors for the continued processing of personal data. Several schools have sent us a questionnaire or an agreement which they have asked us to complete, however this is not feasible for us to complete for every school. We want to ensure that our terms are consistent for every school, therefore we have developed our own Data Handling Agreement. Please contact our DPO to request a copy of this.

2. Is any personal data transferred outside of the European Economic Area (EEA)?
   a. HegartyMaths engage some third parties who operate outside of the EEA. Where this takes place, HegartyMaths have ensured that there are appropriate safeguards in place for the protection of any personal data involved in the transfer, such as EU-US Privacy Shield or Standard Contractual Clauses.
   b. We have also entered into Data Processing or Data Sharing Agreements with third parties, where appropriate, to ensure that they maintain at least the same level of security and protection of personal data as we do.
   c. No data relating to pupils is transferred outside of the EEA.

3. What security measures are in place to protect personal data?
   a. We have put in place appropriate measures, on both technical and organisational levels to maintain 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 undertaken.

4. Does HegartyMaths back-up the personal data?
   a. Absolutely. Our back-up is also held within the EEA on cloud servers based in Dublin.

5. What happens to our pupils’ data once the school stops subscribing to HegartyMaths?
   a. HegartyMaths retain all pupil personal data in the platform for a period of 24 months from whichever of the following events occurs first:
      i. the end of the academic year in which the account was last active; OR
      ii. the termination of the contract between HegartyMaths and the school; OR
      iii. the pupil leaving the school.
   b. After the 24 month period, the data is then anonymised by HegartyMaths. We continue to store this data because sometimes schools are late to renew their HegartyMaths license, or decide to cease using HegartyMaths but then renew their license at a later date. By not anonymising the data, this ensures that pupil data
which is stored in the platform already is not lost and pupils can pick up where they left off easily. However, should your school wish for HegartyMaths to anonymise the data before this 24 month period has expired then we are happy to oblige.

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