



User Rights (General Data Protection Regulations)

Statement & Summary of Right from the <u>Information Commissioner's Office</u>	Response from eduFOCUS Ltd regarding EVOLVE Systems.
<i>The right of access: Individuals can request access to their personal data free of charge (in most cases) and ask how you make use of it.</i>	Staff can access their data via their EVOLVE account. Parents and Students can access their data via their myEVOLVE account. For Individuals who do not have user accounts in EVOLVE, Individuals can make Subject Access Requests to the Data Controller.
<i>The right to be forgotten: Individuals can ask you to delete or remove their personal data where there is no good reason for its continued processing.</i>	Individuals may request removal of data by contacting the Data Controller. Note: The decision for removal of data lies with the Data Controller. Data will only be deleted after evaluation of the impact on record keeping.
<i>The right to object: Individuals have the right to object to your usage of their data. Individuals must have an objection on "grounds relating to his or her particular situation".</i>	Students (of legal age), Parents and Staff may object to their use of data in EVOLVE by contacting the Data Controller. The Data Controller (the school) will assess whether there are grounds upon which the data must be kept for legal or other reasons.
<i>Rights related to automated decision making and profiling: GDPR provides safeguards for individuals against the risk that a potentially damaging decision is taken without human intervention.</i>	Our EVOLVE systems do not contain any automated decision-making facility.
<i>The right to be informed: Individuals must know how you intend to use their personal data when it is being gathered, and they must freely give their consent to it. Their consent cannot be assumed or taken for granted. There are particular rules around what information you should supply and at what stage you need to supply the information to your customers</i>	Data Controllers are responsible for obtaining consent for use of individual's data and documenting this clearly. When signing up for a myEVOLVE account, Individuals are asked to confirm agreement to the myEVOLVE Terms and Conditions.

<p><i>The right to rectification: Individuals are entitled to have personal data rectified if it is inaccurate or incomplete.</i></p> <p><i>If you have disclosed the data in question to third parties, you must inform them of the rectification. You should also ensure that your customers are aware of the third parties to whom you have disclosed the data, where appropriate.</i></p>	<p>Parents, Staff and Students may request rectification of data by contacting the Data Controller.</p> <p>Where EVOLVEpay is used, as part of the online payment process, EVOLVE shares the individual's name, contact details and payment amounts (for fraud prevention purposes) with PaymentSense (the payment gateway provider) via an API. PaymentSense processes the payment card details provided by the parent at the point of payment. PaymentSense is PCI Level 1 Compliant.</p> <p>EVOLVE does not store any credit or debit card details.</p> <p>Where text messaging services are used, EVOLVE only shares the mobile telephone number and content of text message with TextMarketer (the SMS service provider) via an API so that text messages can be sent.</p>
<p><i>The right to restrict processing: This means that in some cases individuals can allow you to store their personal data but can also state that you are not allowed to process that data for any reason.</i></p>	<p>Individuals may request a restriction in processing by contacting the Data Controller.</p>
<p><i>The right to data portability: Individuals can transfer or move their personal data between service providers easily and safely, without affecting the usability of the data.</i></p>	<p>Upon a request we will work, within reason, with the receiving service provider to provide data in a format for portability.</p>