

# Privacy Notice

## Privacy Notice for Schoolcomms Users

Schoolcomms, part of ParentPay limited, is engaged in the design, development, sales, marketing, supply, maintenance and operation of payment collection, payment processing, parent communication and management information systems and services for the education market.

This notice explains to Schoolcomms Users (“you/your”) how ParentPay (“we/us”) use your personal information.

### This privacy notice covers:

- Why we use your personal information
- The legal basis for processing
- What personal information we use
- How we use your personal information
- Your rights under data protection legislation
- Sharing personal information with third parties
- How long we may keep your information
- Changes to our privacy notice
- Contact details for our Data Protection Officer

### Why we use your personal information

The Schoolcomms payment solutions and communication platforms provided to schools and their parents, are governed by a contract between us and the schools, Multi-Academy Trust or a Local Education Authority (“Schoolcomms Customer”), and also the Terms and Conditions that you agree with when you sign up (“Schoolcomms User”).

We process your personal data for the following purposes:

- to provide you with the service activated and registered for
- the verification of your identity where required
- for the prevention and detection of crime, fraud and anti-money laundering
- for the ongoing administration of the service
- to allow us to improve the products and services we offer to our customers
- for research and statistical analysis including payment and usage patterns
  - We only use the data in an anonymized manner when we use your data for this purpose.
- to enable us to comply with our legal and regulatory obligations

- to offer new products and services to you which are relevant and appropriate, and only to the extent that would be reasonably expected.

If we plan to introduce further processes for the use of your information, we will provide information about that purpose prior to such processing.

## The legal basis for processing

Under Data Protection Law, there are various grounds which are considered to be a 'legal basis for processing'.

The legal basis for processing should be determined by the Data Controller.

Where we are the Data Processor, the legal basis is determined by the Customer. Typically, the legal basis in this scenario is:

**'processing is necessary for the performance of a task carried out in the public interest'**

Where we are the Data Controller, the legal basis for processing is based on:

**'processing is necessary for the purposes of legitimate interests pursued by the controller'**

It should be noted that in some circumstances this legal basis may vary, however, we always operate in full compliance with Data Protection Law and will only process data with a fair and reasonable legal basis for doing so.

## What personal information we process

In order to carry out these services, we obtain (either from the Customer and/or from you directly) and process the following information:

Data Subject (Who)	Data Category (What)	Description
Pupil \ Student	Forename	This is the forename of the pupil.
Pupil \ Student	Surname	This is the surname of the pupil.
Pupil \ Student	Known as	This is the name that the pupil is known as.
Pupil \ Student	DOB	This is the date of birth of the pupil.
Pupil \ Student	Gender	This is the pupil's gender
Pupil \ Student	Year Group	The year the pupil is in
Pupil \ Student	Registration Class	The name of the pupil's registration class (if any)
Pupil \ Student	Salutation	This is the pupil's salutation.

<b>Data Subject (Who)</b>	<b>Data Category (What)</b>	<b>Description</b>
Pupil \ Student	Dietary Requirements	This is the pupils special dietary requirements
Pupil \ Student	Postal Address	The student's postal address
Pupil \ Student	Meal Selections and spend history	This is a history of a pupil's meal selections and spends for school meals or non-meal-related items.
Parents \ Contacts	Title	This is the contact's title (Mr, Mrs, Ms, etc).
Parents \ Contacts	Forename	This is the contact's forename.
Parents \ Contacts	Surname	This is the contact's surname.
Parents \ Contacts	Authentication data	Username and password or other authentication tokens
Parents \ Contacts	Gender	The contact's gender
Parents \ Contacts	House Name	The text entered as the contact's house name.
Parents \ Contacts	Street	The text entered as the contact's street.
Parents \ Contacts	Locality	The text entered as the contact's locality.
Parents \ Contacts	Town	The text entered as the contact's town.
Parents \ Contacts	Postcode	The text entered as the contact's post code.
Parents \ Contacts	Day Telephone	The contact's daytime telephone number.
Parents \ Contacts	Home Telephone	The contact's home telephone number.
Parents \ Contacts	Mobile Telephone	This is the contact's mobile telephone number.
Parents \ Contacts	Email	This is the contact's E-mail address.

<b>Data Subject (Who)</b>	<b>Data Category (What)</b>	<b>Description</b>
Parents \ Contacts	Payment card details	Payment details are forwarded to a 3rd party payment processor
Parents \ Contacts	Other	This is the contact's alternative communication method.
Parents \ Contacts	In-app messages	Messages sent from parents to school within the application
Parents \ Contacts	Trouble ticket data	When users submit trouble ticket information, this gets stored.
Parents \ Contacts	Payment History and balances	This is the contact's history of payment transactions, including reversals, refunds and withdrawals of funds.
Parents \ Contacts	Shop information	ParentPay can be used as a payment page from externally or internally hosted shop systems. This the information captured as part of that ("shopping basket").
School Staff	Title	This is the staff member's title (Mr, Mrs, Ms, etc.).
School Staff	Forename	This is the staff member's forename.
School Staff	Surname	This is the staff member's surname.
School Staff	Gender	The staff member's gender
Website Access	IP Address	The network address of your device or internet connection
Website Access	Browser Type and Version	The type of Web Browser your device is using
Website Access	Cookies	Special records in your browser to help the website operate
Website Access	Web Analytics	Generalised information about browsing behaviour and page statistics

## How we process your personal information

We use your personal information, and some of our employees have access to such information, only to the extent required to carry out the services for you and on behalf of the Customer.

We have introduced appropriate technical and organisational measures to protect the confidentiality, integrity and availability of your personal information during storage, processing and transit.

We are a Level 2 PCI-DSS certified organisation and operate an ISO27001 compliant security programme to help protect your data at all times.

The Schoolcomms Products and Services only processes your personal information in the UK.

Some of our supporting services (for example Microsoft CRM), might use cloud platforms that operate from Third Countries outside of the EEA. Where this is the case, we ensure that adequate safeguards are established to protect your data.

## Your rights under Data Protection Law

### Right to Access

You have the right of access to your personal information that we process and details about that processing.

You can usually access that information directly within the Schoolcomms Products and Services (self-service). However, should this not be possible, you can raise a Data Subject Access Request (DSAR) to receive this information in another format.

### Right to Rectification

You have the right to request that information is corrected if it's inaccurate. You can usually update your own information using the Schoolcomms Products and Services (self-service). However, should this not be possible, your child's school will need to correct the data held by them and provided to us for processing.

### Right to Erasure (Right to be Forgotten)

You have the right to request that your information is removed; depending on the circumstances, we may or may not be obliged to action this request.

### Right to Object

You have the right to object to the processing of your information; depending on the circumstances, we may or may not be obliged to action this request.

### Right to Restriction of Processing

You have the right to request that we restrict the extent of our processing activities; depending on the circumstances, we may or may not be obliged to action this request.

## Right to Data Portability

You have the right to receive the personal data which you have provided to us in a structured, commonly used and machine readable format suitable for transferring to another controller.

## Right to lodge a complaint with a supervisory authority

If you think we have infringed your privacy rights, you can lodge a complaint with the relevant supervisory authority. You can lodge your complaint in particular in the country where you live, your place of work or place where you believe we infringed your right(s).

You can exercise your rights by sending an e-mail to [dpo@parentpay.com](mailto:dpo@parentpay.com). Please state clearly in the subject that your request concerns a privacy matter, and provide a clear description of your requirements.

**Note: We may need to request additional information to verify your identity before we action your request.**

## Sharing personal information with third parties

We use a range of trusted service providers to help deliver our services. All of our suppliers are subject to appropriate safeguards, operating in accordance with our specific instructions and limitations, and in full compliance with Data Protection Law.

These service providers include:

- Payment Processors – to securely process your card payments (we do not see, or store payment card details)
- SMS Providers – to send out our SMS notifications or messages sent by Customers using Schoolcomms Products and Services
- Email Providers – to send out our email notifications or messages sent by Customers using Schoolcomms Products and Services
- Hosting Providers – to manage our secure enterprise datacentres
- Security Providers – to protect our systems from attack
- Telephony Providers – we might record calls for training, quality and security purposes
- Support Portal (ZenDesk) – so that you can easily ask for help

We may also have access to your personal information as part of delivering the service.

If we need to change or add additional third parties, we will always update our Privacy Notice accordingly.

We will only disclose your information to other parties in the following limited circumstances

- where we are legally obliged to do so, e.g. to law enforcement and regulatory authorities
- where there is a duty to disclose in the public interest
- where disclosure is necessary to protect our interest e.g. to prevent or detect crime and fraud
- where you give us permission to do so e.g. by providing consent within the Schoolcomms Products and Services or via an online application or consent form

## How long we may keep your personal information

We will only retain information for as long as is necessary to deliver the service safely and securely. We may need to retain some records to maintain compliance with other applicable legislation – for example finance, taxation, fraud and money laundering law requires certain records to be retained for an extended duration, in some cases for up to seven years.

## Changes to our Privacy Notice

This policy will be reviewed regularly and updated versions will be posted on our websites.

## Contact details for our Data Protection Officer

We have appointed a Data Protection Officer (DPO); their contact details are as follows:

**[dpo@parentpay.com](mailto:dpo@parentpay.com)**

or

Data Protection Officer

ParentPay

Ricoh Arena

Phoenix Way

Coventry

## Packages

- **Full Suite**
- **Communication**
- **Cashless**
- **Engagement in Learning**
- **Package Comparison**

## For Schools

- **Support**
- **Contact Us**
- **Case Studies**
- **Schoolcomms' Data Processing Agreement and GDPR**
- **ASCL Member Benefit**
- **SIMS Integrated**

## Company

- **Our Story**
- **What's New**
- **Partners**
- **Careers at Schoolcomms**

## Legal

- **Website Terms & Conditions**
- **Privacy Notice**
- **Cookie Policy**
- **Copyright**
- **Sitemap**

0333 332 7147

**[contactus@schoolcomms.com](mailto:contactus@schoolcomms.com)**

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