

# InVentry and GDPR

## Helping our customers

As a data controller for the information within your school, we understand that the data within your InVentry unit is important to you. Although the system provided is maintained by InVentry Limited, the data remains within your control. We have no access to this data without your consent and as such do not process the data. Only in certain circumstances will InVentry Limited have access to this data, and these will be outlined and explained later in this document. However, to ensure the system meets the requirements laid down in Article 32 – Security of Processing of the General Data Protection Regulations (GDPR), we have taken measures to ensure that all data within the system is secure and safe at all times. The data that is housed on the InVentry system within your premises is encrypted at a database level using 256-bit encryption.

The information that InVentry captures when visitors, staff and students sign in to your site is your data, and as such, the system allows you to choose what this is and how it is managed. However, we would advise that you consider the data being processed in line with the requirements laid down in GDPR with regards to the principles relating to data processing described in Article 5. It is worthwhile noting that this choice is one you make as the controller of data on your site. We would recommend that this retention period should reflect the school's policy on data retention.

The Information Record Management Society (IRMS) Toolkit for Schools 2016 recommends the following data retention periods:

- Visitor attendance: Data to be kept for the current year plus a minimum six years with a review at the end of that period.
- Staff attendance: Data to be kept for the current year plus a minimum six years
- Pupil attendance: The Department for Education School attendance guidance, November 2016, requires every entry in the attendance register to be preserved for a minimum period of three years after the date on which the entry was made. This information would be held within your MIS.

The IRMS toolkit can be found at: <http://irms.org.uk/page/SchoolsToolkit>

The DfE guidance can be found at: <https://www.gov.uk/government/publications/school-attendance>

In all the above instances, the information held within your InVentry system is under your local control on a PC within your network, and subject to your own data protection and handling policies.

### Consent

'Lawfulness of processing' is at the heart of GDPR and schools must ensure that this is complied with, but you don't have to rely just on consent. Schools can process data without necessarily asking permission to do so, other reasons include;

- Processing is necessary for compliance with a legal obligation to which the data controller is subject;
- Processing is necessary in order to protect the vital interests of the data subject or of another natural person;

So, for example;

- Section 537A of the Education Act 1996 – requires schools to maintain attendance records:
- The Regulatory Reform (Fire Safety) Order 2005 England and Wales - Requires an emergency evacuation plan that includes ensuring all those on site are safe accounted for.

Both above provide legal grounds for processing data with InVentry.

## InVentry Limited as a processor

There are four occasions where all or some of the information from your InVentry system would be processed by InVentry Limited, all of which involve processing data whilst not on your site or within your network.

The first of these would be when using InVentry Anywhere. InVentry Anywhere is a subscription based licensed service that takes visitor and staff information, when requested by the organisation, from your system for the purposes of emergency evacuation such as fire. The information is uploaded to the InVentry Anywhere cloud server (owned and maintained by InVentry Limited, housed within the UK) using SSL/https and updated each time a visitor or staff member signs in our out. Visitor and staff (other than app log in details) information is purged from this server at 23:59:59 each evening as it is no longer required or accurate and this reflects Principle D - 'Accurate and, where necessary, kept up to date' of Article 5 in GDPR.

The second occasion where your data is processed by InVentry Limited would be for fault finding and service desk support, this is part of your maintenance licence. There may be times where we need to take a copy of the data on your system to test it within our offices. Before removing data in any form, we will seek your consent to do so, either verbally or written, and take all steps to minimise its collection. This data is subject to a stringent internal policy and procedure ensuring that ownership of the data is recorded, these include:

- Where images of data are required, they are clipped to reduce the amount of data captured.
- Permission to download an organisations database can only be authorised by a senior service desk member of staff.
- All data is deleted and removed from our internal servers, of which those used for customer data storage are not backed up, and records once the fault has been fixed and this is recorded.

The third is if the organisation chooses to use the badge making service. The data submitted in this process is a decision for the controller, based on their requirements. When the data is submitted it is uploaded to and downloaded to our office from our secure cloud servers where it is stored for a maximum of 24 hours via https. Once the badge order is confirmed and dispatched, we retain the data for 51 days to ensure correct completion of the order.

The last is if you choose to use the SMS option for notifications of visitor arrival. If you opt for this, the mobile number is shared with a service provider who is compliant with the requirements of GDPR and solely for this purpose. The retention periods for this service is outlined in our data sharing agreement.

InVentry Limited collects anonymised data to allow for future developments to the software along with providing insights and metrics to help you improve how you use your InVentry system within your organisation. This data includes:

- Number of visitors per day
- Number of staff signed in per day
- Number of pupils signed in or out per day
- Database size
- Name of current MIS system (if applicable)
- Geographical location of InVentry system
- Hardware details of InVentry system

InVentry Limited understand how important your data is to you. If you have any further question, do not hesitate to get in touch with us via [dpo@inventory.co.uk](mailto:dpo@inventory.co.uk)

