

Data Protection & Xperios

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Pete Stickland

Petestickland@paritor.co.uk www.paritor.com

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Introduction

Paritor Ltd are the innovative force behind advanced Tuition Managements solutions for designed specifically for the UK Music and Performing Arts Organisations. Given the unique requirements of these sectors, our clientele is tasked with recording essential information related to Pupils, Parents, Teachers, Venues, and Staff members.

This document covers our data processing procedures, encompassing the various types of data handled, the duration of processing, the intended purposes for data collection, and the protocols for data destruction. Additionally, we will delve into the crucial aspects of data compliance and security, with a focus on our adherence to ISO and PCI standards.

Processing Data

The following describes who is responsible for the data, the type of data that is processed within the system, and what should happen if the Agreement ends.

Describe the identity of the Controller and Processor

The Parties acknowledge that for the purposes of the Data Protection Legislation, the Customer is the Data Controller, and Paritor are the Data Processors

Describe the subject matter of the processing

The registration and recording of:

- Auditions,
- events,
- examinations,
- hires.
- memberships,
- pupil parent evenings,
- pupil parent reports,
- tuition,

The above will involve:

- Scheduling and recording lesson delivery, attendance, assessment levels,
- invoicing,
- recording payments and debt for the above services,
- and where applicable creating recurring card payments for the above.

Describe the duration of the processing of the data

The processing will commence at the start of the contract and shall cease when the contract terminates in line with the terms and conditions of the contract.

Describe the nature and purpose of the processing

The nature of the processing means any operation such as hosting, collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data (whether or not by automated means.)

For the purpose of the registration and recording of information for your music service included in 'Subject Matter for Processing'.

Describe the type of data being processed

The types of data that will be processed in accordance with your contract shall be:

Pupil Information

Name

Address

Telephone Number

Email address

School

Gender

- * Pronouns
- * Nationality
- * Ethnicity
- * LAC
- * FSM
- * Pupil Premium
- * Has previously been in care
- * Is a carer
- * Disability & Medical Information
- * Consent Information

Debtor/Booker Information

Name

Address

Telephone Number

Email address

Schooble account details

*GDPR Consents

Venue Information

Name

Address

Telephone Number

Email address

**contact at that venue: Name, contact information, Job role

Teacher Information

Name

Address

Telephone Number

Email address

Date Started

* Date of Birth

- * Area
- * Job Role
- * Faculty
- * Line Manager
- * Skills

Administrator Information

Name

Address

Telephone Number

Email address

Schooble account details

- *Indicates optional information that you can select if you want to collect within the system settings,
- **Indicates information you can complete if you wish.

Describe the plan for return and destruction of the data once the processing is complete.

Schedule 1, s1 Data Hosting (1.2 and 1.3) of the Support Service Level Agreement covers what happens in this situation.

"Should this Agreement terminate then the Customer, once satisfying itself that it has taken a local copy of the Customer Data, can request in writing that Paritor disposes of all hosted copies of the Customer Data, and Paritor shall comply with such instructions. Should such instructions not be received within a period of at least 30 days from any such cancellation, Paritor will destroy all copies of the Customer Data.

Customer Data extracted by the Customer, either in the form of printed data or electronic data, is the responsibility of the Customer and of the Customer's member of staff who performed the action."

ISO Security Standards

ISO is the international standard for information security. They set out a specification for an effective information security management system (ISMS). ISO 27001 outlines the best practice approach and helps organisations manage their information security by outlining standard guidelines.

It's important to note that as Xperios is a cloud-based system, all customer data is hosted and supported by Microsoft on their Azure servers at their UK South location, not Paritor. With this in mind, many answers on the ISO questionnaire will reference this.

You can find a copy of the ISO Security Standards Questionnaire <u>here</u>.

PCI DSS Compliance

PCI are the Payment Card Industry (PCI) who have created the Data Security Standards (DSS) for those handling credit/debit card information. To become compliant Paritor must complete a Self-Assessment Questionnaire, specifically a SAQ-D for Service Providers.

It's important to note that Paritor and it's product Xperios does not handle or store the card details held by the customers customer. This is the responsibility of the selected Card Merchant (e.g. SAGE, WorldPay). Paritor connect to those services via an API link and pass a unique token to these, which is then then checked and information about the transaction such as it's status is passed back and logged in the Debtor's ledger.

You can find a copy of the PCI Compliance SAQ-D here.