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1. Introduction

PS Analytics is marketed as a single product, but in practice PS Analytics is a term which describes the activities of the Business Intelligence team and the services that we provide to our customers.

The aim of PS Analytics is to help customers gain insights from their data and to make the data accessible via the use of cloud services. Within the education sector we have attempted to standardise what we offer to our customers in the form of Dashboards and Reports across the core systems that we sell.

Therefore, a typical PS Analytics installation (education customers), will include data from the financial system (PS Financials), HR system (PS People) and school management information system. However, depending on the customers unique requirements there are no limits to the quantity and diversity of the data that we will ingest.

The rich source of data, pooled from disparate data sources can then be consumed by the customer using various technologies, primarily MS Power BI, MS Reporting Services and MS Excel.

2. Data Access Policy

PS Financials employees will access, and store customer data as required to meet the deliverables of each PS Analytics implementation.

The customers data may ultimately reside within the PS Financials Cloud or Microsoft Azure or both depending on the most appropriate architecture at the time. There are separate GDPR documents referring specifically to PS Cloud and MS Azure.

PS Analytics customers consume their data in a variety of ways which will be entirely dependent on each customer's unique requirements.

3. Data Processing

Service Data is any information, including personal data, which is stored in or transmitted via the PS Financials Ltd services, by, or on behalf of, our Customers.

From a privacy perspective, the Customer is the controller of Service Data, and PS Financials Ltd is a processor. This means that throughout the time that a Customer subscribes to services with PS Financials Ltd, the Customer retains ownership of and control over Service Data in its account.

PS Financials Ltd uses Service Data to operate and improve our services, help Customers access and use the services, respond to Customer inquiries, and send communication related to the services.

PS Financials Ltd prioritises data security and combines enterprise-class security features with comprehensive audits of our applications, systems, and networks to ensure Customer

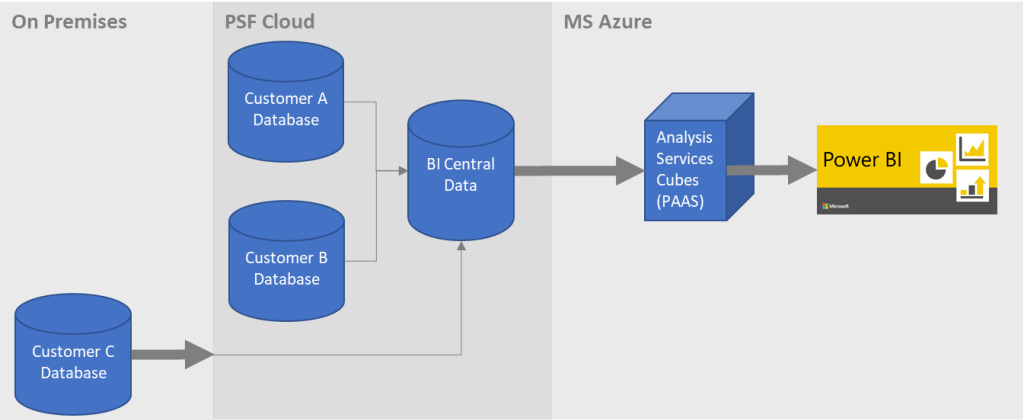
and business data is always protected. For example, PS Financials Ltd servers are hosted at Tier III ISO 27001 compliant facilities.

Additionally, we engage third-party security experts to perform detailed penetration tests on a periodic basis, and our Support team is available to respond to security alerts and events.

4. Key System Specifications

The system architecture adopted to extract, transform and load customer data to PS Financials servers is flexible depending on both customer requirements and data sources to be processed.

The flow of data for a standard PS Analytics implementation for education customers is illustrated below.



4.1 Transfer of data between On-Premises and PSF Cloud

Data flows between on-premises customer servers and the PSF Cloud (or potentially directly to MS Azure) using Azure Data Factory, and all traffic is encrypted. You can find out more about **Azure Data Factory** here https://docs.microsoft.com/en-us/azure/data-factory/introduction

4.2 Transfer of data between PSF Cloud and MS Azure

Data flows between the PSF Cloud and Microsoft Azure using the **On-premises Data Gateway**, and all traffic is encrypted. You can find out more about how the On-premises Data Gateway works here https://docs.microsoft.com/en-us/azure/analysis-services/analysis-services-gateway

4.3 MIS Data Capture

The method used to acquire school MIS data is a unique case as we use a 3rd party called Wonde to extract the data from a range of supported MIS systems to our PS Cloud BI database. Wonde maintain their own GDPR documentation to cover the service they provide via their REST API and customers can selectively choose what data from their school MIS they want to share with 3rd parties when configuring Wonde. You can find more information on Wonde including their data protection policy here https://www.wonde.com/schools

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5. Data Protection and Security

- PS Financials Ltd complies with the Data Protection Act 1998 and any equivalent binding UK legislation (new Data Protection Bill) and incorporating the General Data Protection Regulation('GDPR') which comes into force on 25th May 2018.

- PS Financials Ltd will not divulge any of the Customer's confidential information to any person except to its own officers, employees, agents and representatives and then only to who need access to that information to enable PS Financials to fulfil its contractual obligations to the Customer.

- We confirm that if PS Financials Ltd processes any Service Data on the Customer's behalf when performing its obligations, then the Customer shall be the data controller and PSF shall be a data processor, and that:

    1. The Customer shall ensure that it is entitled to transfer the relevant Service Data to PS Financials Ltd;
    2. We will only act on the written instructions of our Customer (unless required by law to act without such instructions);
    3. We will ensure that people processing the Service Data are subject to a duty of confidence;
    4. We take appropriate measures to ensure the security of processing;
    5. We will only engage a sub-processor with the prior agreement of our Customer which is given in the contractual agreement between PS Financials and our Customer;
    6. We shall inform the Customer of any intended changes concerning the addition or replacement of sub contracted processors;
    7. We will assist our Customer in providing subject access and allowing data subjects to exercise their rights under the GDPR;
    8. We will assist our Customer in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessment;
    9. We will delete or return all Service Data to our Customer as requested or as stipulated at the end of the contract;
    10. We will submit to audits and inspections and provide the controller with whatever information it needs to ensure that we are both meeting the Article 28 obligations and tell the controller immediately if we are asked to do something infringing the GDPR or other data protection law of the EU or a member state;
    11. We acknowledge that nothing within our contract relieves us of our own direct responsibilities and liabilities under the GDPR;
    12. We will co-operate with supervisory authorities (such as the ICO) in accordance with Article 31 of the GDPR;
    13. We will ensure the security of our processing in accordance with Article 32;
    14. We will keep records of our processing activities in accordance with Article 30.2;
    15. We will notify any data breaches to the controller in accordance with Article 33;
    16. We employ a data protection officer in accordance with Article 37

- The PS Financials system incorporates a rigorous security protocol allowing access to authorised personnel only, via a User Name and Password.
- Authorised users are also subject to access restrictions determined by their personal level of security clearance.

- Each Customer administrator can set up their own **Access Levels** using a straightforward tick box system, to add or remove access to parts of the system at different security levels.

6. Data Holding and Destruction Policy

- PS Financials Ltd recognises that privacy and data security issues are top priorities for Customers. PS Financials Ltd does not disclose Service Data except as necessary to provide its services to its Customers and comply with the law.

- PS Financials Ltd stores its service data for PS Cloud at data centres based in the UK.

- PS Financials Ltd is committed to the protection of data held whilst customers are accessing the system

- If a customer cancels their agreement for PS Cloud then they have 30 days to request copies of all their data, after which time their Customer setup for software and databases, including all backups, is deleted from the PS Cloud system, meaning that all personal data is removed.

- If a customer is running PS Financials as a local 'on premise' installation and cancels their agreement with PS Financials Ltd, the Customer is asked to remove all related software from their systems.

- No paper copies of customer data are held at any time by PS Financials. Access is solely via our secure systems for the purposes of guaranteeing Project Partners' full and comprehensive use of the system and to realise our aim of effective, first class customer service.

- In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose personal data to respond to court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information with relevant law enforcement agencies or public authorities if we believe same to be necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms and Conditions, or as otherwise required by law.

7. Software Renewal Policy

- PS Financials Ltd utilizes different software applications in our rolled-out products. When new versions of software are released, for security and stability reasons, we carry out research to determine if any of the changes effect components/functions that we use.
- If we highlight any changes that are security based and could comprise our software build, we aim to have the software updated as soon as possible.
- If we highlight any changes that are feature based, that do not affect the day to day running of the system, we look to roll these updates out at the next development cycle for updates.

8. Security Auditing

Data Protection is of paramount importance **to PS Financials'** operations and therefore we conduct regular Security Audits and penetration (pen) testing of all our systems and processes.

PS Cloud has been tested and approved by the National Computer Centre (NCC)

9. Useful Information

PS Financials
Park House,
Peterborough Business Park,
Lynch Wood,
Peterborough
PE2 6FZ

PS Financials Ltd Data Protection Registration Number – Z6413626
Company Registration Number – 04323067

If you have a more in-depth query that relates to Data Protection please e-mail our Data Protection Officer at:

DataProtectionOfficer@PSFinancials.com **or** DPO@PSFinancials.com