



# PS Budgeting GDPR

---

# PS Budgeting - Data Protection & GDPR

## Contents

- 1. Introduction to Data Protection**  
A brief introduction to the company's background, experience and an overview to the PS Budgeting system.
- 2. Data Access Policy**  
Outlines PS Budgeting' policy on data handling and access with regards to company employees and customer users.
- 3. Data Processing**  
Data Processing responsibilities.
- 4. Key System Specifications**  
Information on the design of the system architecture
- 5. Data Protection and Security**  
Details on how the PS Budgeting system keeps data safe.
- 6. Data Holding and Destruction Policy**  
What happens to a customer's data if they choose to end their partnership with PS Financials Ltd?
- 7. Software Renewal Policy**  
The company's software renewal policy, outlining the timescales and process involved in the software renewal including auditing of security processes.
- 8. Security Auditing**
- 9. Useful Information**

# PS Budgeting - Data Protection & GDPR

## 1. Introduction

- PS Budgeting in this document refers to a software module and database used for the purpose of creating a school's budget. An Education establishment's current Accounting system coding structure can be uploaded into the PS Budgeting module. Users will then manually input their intended budget values against the Accounting coding, and report and manipulate that data. When the budget is approved it can be locked down to prevent further changes, and then automatically updated back into the Accounting system, where it is used in the standard functionality to manage spend and income.
- The software is provided exclusively by PS Financials Ltd. There are other PS Financials Ltd products which are the subject of other GDPR documents.
- PS Budgeting is accessible through a desktop application.
- The PS Budgeting database is hosted in a PS Cloud environment, managed by PS Financials Ltd. PS Cloud is externally hosted and accessed via an internet connection
- All customers using PS Budgeting share the same single database in PS Cloud. The privacy control to ensure that authorised users can only see their own data is through individual logins with passwords.
- PS Financials Ltd is a processor of the budget data. In the PS Cloud environment PS Financials Ltd maintains the software and backups of the databases.
- PS Financials Ltd is an organisation with a strong background in the development and application of software technology to provide solutions in a wide variety of sectors in the Education, Commercial and Charity sectors. PS Budgeting is provided for use by the Education Sector customer's only.
- PS Financials Ltd is registered under the Data Protection Act 1998 (Registration Number: Z6413626) and is fully compliant with the GDPR. Strict adherence to the General Data Protection (GDPR) contained therein is integral to our business operations. Data Protection is intrinsic to all our operations and, as such, we ensure that all our procedures are robust and comprehensive. Every possible effort is exerted to maintain data integrity.
- **PS Financials Ltd Data Protection Officer can be contacted at :**  
[DataProtectionOfficer@PSFinancials.com](mailto:DataProtectionOfficer@PSFinancials.com)
- The following guide will answer more specific data protection queries but if you have any more questions please call the Helpdesk team on 01733 367 330

## 2. Data Access Policy

- **PS Budgeting** users are divided into two groups **PS Financials Ltd Employees** and **Customer Users**

### **PS Financials Ltd Employees**

- PS employees are given limited access rights for the PS Budgeting system based upon their operational requirements. Support, system building and consultant staff have full administration rights to the PS Budgeting systems, which allows them full access to the data through the application and the ability to manage user setup
- PS Budgeting users are set up with secure passwords which are both 'salted' and encrypted
- All staff access is fully logged and monitored regularly - allowing a clear audit trail, and exact usage information
- Each PS employee uses a secure login and password for the PS Financials Ltd internal systems and network. Employees use these identities and passwords in keeping with secure practices (passwords are not compromised by sharing)
- Employees are educated on matters of security and integrity, and the confidentiality of information
- Relevant user IDs and passwords are disabled on leaving the company's employment
- Employees access levels are reviewed on a regularly basis
- All paper-based sensitive information is disposed of by shredding
- Laptops and mobile devices used by members of staff that work outside of the office environment and on customer sites are all encrypted. Laptop hard drives are fully encrypted using Bitlocker which uses AES encryption. Smartphones and tablet devices are all password protected and use built in encryption where available.

### **Customer Users**

- Two levels of user access are permitted to the PS Budgeting data.  
Level 1 users can only read their data  
Level 2 users can read and edit their data.  
When setting up the customer account, the system creates a secure password-based user account with secure passwords which are both 'salted' and encrypted
- For Forgotten passwords, PS Budgeting customers can contact PS Support for assistance.

## 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.

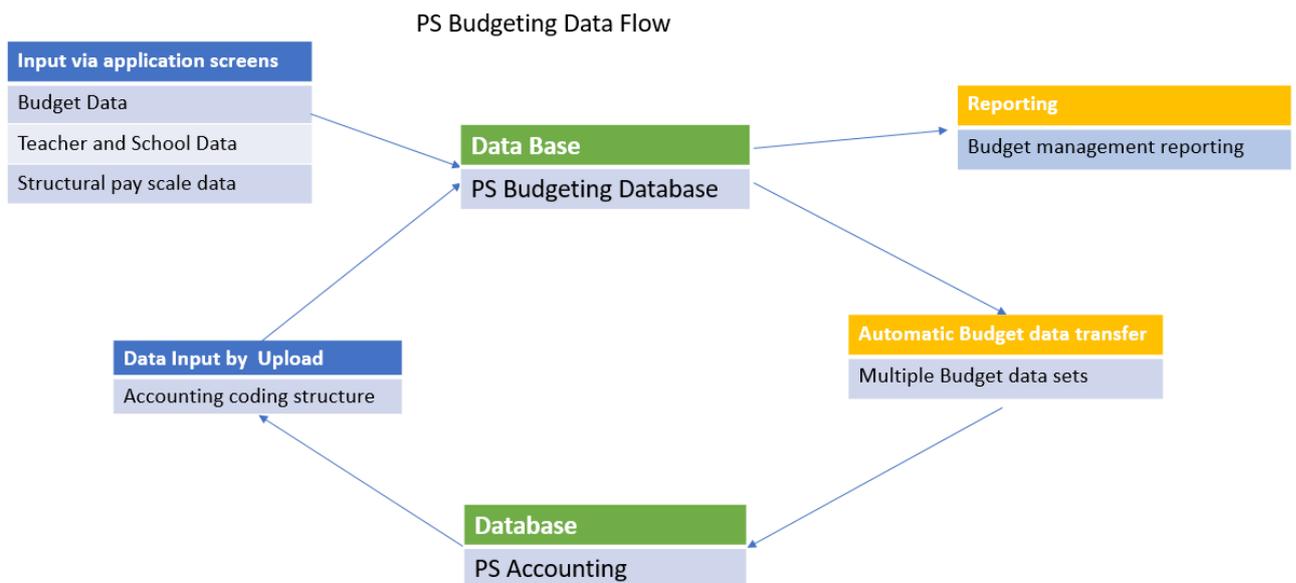
PS Financials Ltd prioritises data security and combines enterprise-class security features with comprehensive audits of our applications, systems, and networks to ensure Customer and business data is always protected. For example, PS Financials Ltd servers are hosted at Tier III ISO 27001 compliant 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

### 4.1 Data Flow

The flow of Service Data through a typical PS Budgeting system is illustrated below



# PS Budgeting - Data Protection & GDPR

- PS Budgeting module is a desktop Application based user interface
- The software is written in DotNet and C# (C Sharp) and runs exclusively on Microsoft SQL Server databases
- The application's database holds accounting structural and budget building data involved in the production of a customer's budget.
- The final approved budget can be 'locked', preventing further amendment by users.

Each customer data set includes some general detail about the school, the Accounting nominal and cost centre codes, and the budget values against them.

There is data held in PS Budgeting which specifically refers to the user.

There is specific data regarding teaching and support staff below which may be holding personal data.

User	Teacher	Support Staff
First name	Payroll number	Payroll number
Last name	Forename	Forename
Contact Email	Surname	Surname
	Job	Job
	Service start date	Service start date
	Working Hours	Working Hours
	Grade and Scale point	Grade and Scale point
	Contract start date	Contract start date
	Contract End date	Contract End date
	Maternity dates	Maternity dates
	Salary	Salary

Please note, the only Pupil information held in PS Budgeting is in the form of summary counts of pupil numbers in different categories

## 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 Budgeting** system incorporates a rigorous security protocol allowing access to authorised personnel only, via a **User Name** and **Password**.

# PS Budgeting - Data Protection & GDPR

- PS Budgeting incorporates an internal audit log of changes made within the application.
- PS Financials Ltd maintains and Audit trail of logins to PS Budgeting.

## 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 Budgeting 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 Budgeting they have 30 days to request copies of all their data, after which time their Customer setup for user access software and databases, including all backups, is deleted from the PS Budgeting system, meaning that all personal data is removed.
- No paper copies of customer data are held at any time by PS Financials Ltd. 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 Ltd operations and therefore we conduct regular Security Audits and penetration (pen) testing of all our systems and processes.

## 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](mailto:DataProtectionOfficer@PSFinancials.com) or [DPO@PSFinancials.com](mailto:DPO@PSFinancials.com)