

## What is Salamander Active Directory

SalamanderSoft's Active Directory is a provisioning tool which automatically update the school's systems with the data stored in the school management system (MIS). Salamander Active Directory can provision local Active Directory, Azure Active Directory, Office 365, Class Notebooks, Google's G Suite and Exchange amongst others.

## Document Aims

This document details the data objects, processing, safeguarding and security of the data that we, SalamanderSoft, will process on behalf of the customer. This information provides a framework for our Data Processing Agreement with you and supports our joint obligation to comply with the Data Protection Act 1998, the General Data Protection Regulation (EU) 2016/679 and comply with the Information Commissioner's Office mandate. In order to use our products your organisation must understand and formally accept this agreement.

## Overview of Data Movement

Our products extract the information from your school MIS and then update your other systems in the manner you have requested. It is not stored elsewhere or held apart from in memory except in the following circumstances:

1. If you have asked explicitly for it to be stored elsewhere e.g. a list of new accounts.
2. As a temporary measure during installation or support. After which any temporary stored data is deleted.
3. Log files could contain some personal information.
4. If required to be passed to a different computer for processing.

## Subject matter of Processing

Our school customers contract us to process the information in their management system and transfer it as required into their other systems in use. This other systems are mainly, but not exclusively, Active Directory, Office 365, Microsoft Azure and G Suite and all their individual components.

## Duration of Processing

Salamander Active Directory is licensed on an annual basis. Before a new annual license is issued a customer must raise a new purchase order or pay an invoice if they do not use a purchase order system. The contract does not automatically roll over.

## Nature of Processing

Data is extracted from the school MIS using MIS provider approved access methods and then provisioned into other systems using their application programming interfaces.

## Purpose of Processing

To use the information in the school management system to provision the other systems in the school. This includes user account generation & maintenance, group generation & maintenance and timetable synchronization. The nature of processing is unique to each school and set up exactly as they require.

## Type of Personal Data

The data requested by the customer to be processed. This will be unique for each customer depending on their requirements. See Transfer and User of Personal Information below for more information.

## Categories of Data Subject

Pupils and staff at the school. Occasionally pupil contacts See Transfer and User of Personal Information below for more information.

## Transfer and Use of Personal Information

For the purposes of provisioning your other systems we require access to the data stored in your MIS. The exact data required will depend on your requirements. Our standard extracts are detailed below, but will depend on the MIS in use in the school. Additional data can be extracted depending on requirements.

### Personal information about pupils who are currently on roll

This will be required to provision user accounts. The standard extract includes:

Forename, Surname, Preferred Forename, Preferred Surname, Admission Number, MIS specific identifiers, Registration Group, Year, House, Gender, Date of Birth, Middle Names, Roll Mode.

### Personal information about adults currently in the employment of the school

This will be required to provision user accounts. The standard extract includes:

Forename, Surname, Preferred Forename, Preferred Surname, Staff Code, MIS specific identifiers, Gender, Middle Names, if the staff member is a teacher.

### Personal information about pupils and adults who have now left the school

This will be required to process leavers.

As for the current pupils and adults, but also including their leaving date.

## Personal information about pupils and adults who have not yet started at the school

This is only required if needing to pre-process new pupils and staff.

As for the current pupils and adults, but also including their joining date and admission status.

## Class information

This is required to create groups or sites based on class membership.

Class name, subject and code, class enrolment and the teachers teaching the class

## Timetable information

Pupils' and staff members' timetables if required for populating calendars.

Class name, subject and code, date and time, room, teacher for the lesson.

## Photographs

Only required if the customer wants photographs adding to their other systems.

## Other information

Almost all of the information in the school MIS is available if required to be used, but will not be extracted if not required.

## Use of Data

The Use of Data policy is provided for schools to ensure that, as Data Controllers, they can determine that appropriate measures are in place to protect the data that they are responsible for.

SalamanderSoft will be acting as data processors as defined by the 1998 Data Protection Act and the General Data Protection Regulation (EU) 2016/679.

SalamanderSoft only processes the data from the school MIS into the other systems used by the school. The data will be used to provision/set up the other systems in use by the school. SalamanderSoft does not store the data in any systems of its own and does not transfer the data from the school systems into other 3<sup>rd</sup> party systems except those requested by the school.

## Data Storage

The aim of our products is to move data from the MIS into the other systems in use by the school. Once the data is in those systems it is the schools responsibility, as the Data Controller, to ensure that it confirms to the Data Protection Act and the General Data Protection Regulation (EU) 2016/679.

There are a few cases where the data is stored elsewhere:

1. Where requested by the school. For example a spreadsheet containing new account details. SalamanderSoft will only do this as requested by the school and the school is responsible for the data once it has been saved.
2. As a temporary measure during installation or support of the product. Once complete this data will be deleted.
3. Log files. Log files can contain some personal information. Typically user account names created, but sometimes error information can contain additional information. The log file location should have appropriate permissions applied.
4. If the data needs additional processing on a separate machine. In this case the data will be stored in an encrypted format in a location with appropriate permissions applied. Once it has been processed it will be deleted.

## Data Security

Information is extracted from the MIS using the APIs provided by the MIS supplier, or in the absence of them, by reading the database. SalamanderSoft uses the credentials that the school provides and depending on the MIS provider and their security model, can only access the information that you give us access to.

When accessing a hosted MIS or 3<sup>rd</sup> party system we will always use industry standard SSL encryption where available.

The information from your school will only be held within your systems and will not be transferred to any of our systems or machines.

## Support

For installation and support purposes we will require access to your servers. We can use whatever remote access systems you require and conform to your policies. By default we will use TeamViewer unless requested otherwise.

When raising support issues please avoid sending personal information to us directly via insecure methods such as email. If we need personal information to resolve an issue, it is better to save such information on the server we remotely connect to, rather than attempting to send it to us.