



## Introduction

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We hold personal data about our clients, for a limited number of business purposes.

This policy sets out how Computer Science UK seeks to protect personal data and ensure that company staff understand the rules governing their use of personal data to which they have access in the course of their work. In particular, this policy requires staff to ensure that the Data Protection Officer (DPO) be consulted before any significant new data processing activity is initiated to ensure that relevant compliance steps are addressed.

The purposes for which personal data may be used by us:

Administrative and Licencing purposes.

*These purposes include the following:*

- *Recording and processing transactions*
- *Licencing reasons: stamping each page of each downloadable resource, with the user's username, email address and full name, so to prevent unauthorised sharing of resources and to trace any instances of individual's breaching their licence agreement*
- *Marketing (CSUK:Teacher customers only – not CSUK:ReviseCS customers).*
- *To notify customers of site maintenance events or similar.*

## Scope

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This policy applies to all staff who must be familiar with this policy and comply with its terms.

### Who is responsible for this policy?

As our Data Protection Officer, Sam Wickins ([admin@computerscienceuk.com](mailto:admin@computerscienceuk.com)) has overall responsibility for the day-to-day implementation of this policy.

# Our procedures

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## Fair and lawful processing

We must process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we should not process personal data unless the individual whose details we are processing has consented to this happening.

## The Data Protection Officer's responsibilities:

- Keeping up to date about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and policies on a regular basis
- Arranging data protection training and advice for all staff members and those included in this policy
- Answering questions on data protection from staff
- Responding to clients who wish to know which data is being held on them by 'Computer Science UK'.

## Responsibilities of the IT Manager

- Ensuring all systems, services, software and equipment meet acceptable security standards
- Checking and scanning security hardware and software regularly to ensure it is functioning properly
- Researching third-party services, such as cloud services the company is considering using to store or process data.

## Responsibilities of the Marketing Manager

- Approving data protection statements attached to emails and other marketing copy
- Addressing data protection queries from clients
- Coordinating with the DPO to ensure all marketing initiatives adhere to data protection laws and the company's Data Protection Policy.

## The processing of all data must be:

- Necessary to deliver our services
- In our legitimate interests and not unduly prejudice the individual's privacy
- In most cases this provision will apply to routine business data processing activities.

## Accuracy and relevance

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

If individuals ask that we correct inaccurate personal data relating to them, this will be done by the Data Protection Officer, Sam Wickins.

## Data security

'Computer Science UK' must keep personal data secure against loss or misuse.

## Storing data securely

- In cases when data is stored on printed paper, it should be kept in a secure place where unauthorised personnel cannot access it
- Printed data should be shredded when it is no longer needed
- Data stored on a computer should be protected by strong passwords that are changed regularly.
- Data stored on CDs or memory sticks must be locked away securely when they are not being used
- The DPO must approve any cloud used to store data
- Servers containing personal data must be kept in a secure location, away from general office space
- Data should be regularly backed up

- All servers containing sensitive data must be approved and protected by security software and a strong firewall.

## Data retention

We must retain personal data for no longer than is necessary. For subscribers to either one of Computer Science UK's websites, their data will be held for no longer than three years after their latest subscription has expired. This is so that the renewal process is simplified for any customer that wishes to renew their membership.

## Transferring data internationally

Computer Science UK uses a London data centre (hosted by 'Kinsta') to hold the website's databases, which will hold customer names, usernames and email addresses (and in the case of purchasing the product '512 Flashcards', the customer's school name will also be stored).

PayPal and Stripe will process customer payment data for the processing of transactions, in accordance with their data policies.

<https://www.paypal.com/ee/webapps/mpp/ua/privacy-full>

<https://stripe.com/gb/privacy>

Customer payment data is sent directly to PayPal or Stripe. Computer Science UK does not process or store any customer payment data. When a customer enters this sensitive information (e.g. card number), Computer Science UK encrypts the transmission of that information using secure socket layer technology (SSL).

## Subject access requests

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Please note that under the Data Protection Act 1998, individuals are entitled, subject to certain exceptions, to request access to information held about them.

Any subject access request will be referred immediately to the DPO and will be processed quickly.

# Processing data in accordance with the individual's rights

Computer Science UK will abide by any request from an individual not to use their personal data for direct marketing purposes. The DPO will be notified about any such request.

## Training

All staff will receive training on this policy. New joiners will receive training as part of the induction process. Further training will be provided at least every two years or whenever there is a substantial change in the law or our policy and procedure.

It will cover:

- The law relating to data protection
- Our data protection and related policies and procedures.

Completion of training is compulsory.

## GDPR provisions

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Where not specified previously in this policy, the following provisions will be in effect on or before 25 May 2018.

## Privacy Notice - transparency of data protection

Being transparent and providing accessible information to individuals about how we will use their personal data is important for our organisation. The following are details on how we collect data and what we will do with it (see table below):

What information is being collected?	Who is collecting it?	How is it collected?	Why is it being collected?	How will it be used?	Who will it be shared with?	Identity and contact details of any data controllers	Details of transfers to third country and safeguards	Retention period
Subscriber's first name	Computer Science UK	Signup / contact forms via the websites (computerscienceuk.com, revisecs.computerscienceuk.com & teacher.computerscienceuk.com)	To identify the customer for licencing reasons. (e.g.: name stamped on pages of downloaded documents to prevent licence agreement breaches and track/trace individuals in the event of licence agreement breaches)	Name stamped on pages of downloaded documents to prevent licence agreement breaches and track/trace individuals in the event of licence agreement breaches.	No one outside the organisation	Sam Wickins admin@computerscienceuk.com	The website's data including customer names and email addresses will be stored in a London data centre (hosted by Kinsta).	CSUK subscriber data will be held for three years after their latest subscription has expired for simplified renewal processing. RCS subscriber data / accounts will be deleted following approximately one year of account inactivity.
Subscriber's surname	Computer Science UK	Signup / contact forms via the websites (computerscienceuk.com, revisecs.computerscienceuk.com & teacher.computerscienceuk.com)	To identify the customer for licencing reasons. (e.g.: name stamped on pages of downloaded documents to prevent licence agreement breaches and track/trace individuals in the event of licence agreement breaches)	Name stamped on pages of downloaded documents to prevent licence agreement breaches and track/trace individuals in the event of licence agreement breaches.	No one outside the organisation	Sam Wickins admin@computerscienceuk.com	The website's data including customer names and email addresses will be stored in a London data centre (hosted by Kinsta).	CSUK subscriber data will be held for three years after their latest subscription has expired for simplified renewal processing. RCS subscriber data / accounts will be deleted following approximately one year of account inactivity.
Subscriber's username	Computer Science UK	Signup / contact forms via the websites (revisecs.computerscienceuk.com & teacher.computerscienceuk.com)	To identify the customer for licencing reasons. (e.g.: username stamped on pages of downloaded documents to prevent licence agreement breaches and track/trace individuals in the event of licence agreement breaches)	Username stamped on pages of downloaded documents to prevent licence agreement breaches and track/trace individuals in the event of licence agreement breaches.	No one outside the organisation	Sam Wickins admin@computerscienceuk.com	The website's data including customer names and email addresses will be stored in a London data centre (hosted by Kinsta).	CSUK subscriber data will be held for three years after their latest subscription has expired for simplified renewal processing. RCS subscriber data / accounts will be deleted following approximately one year of account inactivity.
Subscriber's email address	Computer Science UK	Signup / contact forms via the websites (computerscienceuk.com, revisecs.computerscienceuk.com & teacher.computerscienceuk.com)	To identify the customer for licencing reasons. (e.g.: email address stamped on pages of downloaded documents to prevent licence agreement breaches and track/trace individuals in the event of licence agreement breaches)	Email address stamped on pages of downloaded documents to prevent licence agreement breaches and track/trace individuals in the event of licence agreement breaches.  For very occasional marketing reasons – CSUK;Teacher customers only – not CSUK;ReviseCS customers	No one outside the organisation	Sam Wickins admin@computerscienceuk.com	The website's data including customer names and email addresses will be stored in a London data centre (hosted by Kinsta).	CSUK subscriber data will be held for three years after their latest subscription has expired for simplified renewal processing. RCS subscriber data / accounts will be deleted following approximately one year of account inactivity.
Flashcard customer's schools' name	Computer Science UK	Flashcard product purchase form (teacher.computerscienceuk.com)	To identify the customer for licencing reasons. (e.g.: School name stamped on pages of downloaded flashcard documents to prevent licence agreement breaches and track/trace organisation in the event of licence agreement breaches)	School name stamped on pages of downloaded documents to prevent licence agreement breaches and track/trace individuals in the event of licence agreement breaches.	No one outside the organisation	Sam Wickins admin@computerscienceuk.com	The website's data including customer names and email addresses will be stored in a London data centre (hosted by Kinsta).	CSUK subscriber data will be held for three years after their latest subscription has expired for simplified renewal processing. RCS subscriber data / accounts will be deleted following approximately one year of account inactivity.
Subscriber's PayPal Account Details (collected by PayPal directly) (if PayPal used as payment method)	Paypal (www.paypal.com)	Signup / contact forms via the websites (revisecs.computerscienceuk.com & teacher.computerscienceuk.com)	To enable the processing of the purchase / subscription transaction	To validated and verify customer transactions.	Sent directly to PayPal and not shared outside of their organisation. See their own data protection policy.	www.paypal.com	Data will be collected directly by PayPal and processed in accordance with the organisation's data protection policy.	This data is never held by Computer Science UK
Subscriber's / Customer's card payment details: card holder name, card number and cvc number (collected by Stripe directly) (if credit/debit card used as payment method)	Stripe (www.stripe.com)	Signup / contact forms via the websites (revisecs.computerscienceuk.com & teacher.computerscienceuk.com)	To enable the processing of the purchase / subscription transaction	To validated and verify customer transactions.	Sent directly to Stripe and not shared outside of their organisation. See their own data protection policy.	www.stripe.com	Data will be collected directly by Stripe and processed in accordance with the organisation's data protection policy.	This data is never held by Computer Science UK

## Consent

The data that we collect is subject to active consent by the data subject. This consent can be revoked at any time.

## Data portability

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be done for free.

## Right to be forgotten

A data subject may request that any information held on them is deleted or removed. An erasure request can only be refused if an exemption applies.

## Reporting breaches

In the event of any data security breach, Computer Science UK will ensure that all customers affected are informed immediately so that they can take the necessary steps to keep their personal data safe, for example, update their passwords.

## Monitoring

Everyone must observe this policy. The DPO has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.

## Consequences of failing to comply

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We take compliance with this policy very seriously. Failure to comply puts company individuals and the company itself at risk.

If you have any questions or concerns about anything in this policy, do not hesitate to contact the DPO.