Data Protection Policy

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Introduction

This document outlines the way in which JSSP Ltd accepts, uses and stores data from all sources. We aim to be fully transparent in the way in which data is managed, and when it will be deleted from our systems either periodically or by explicit request.

Pupil data

1. Will you request pupil data when taking photographs?	Yes. We request data for every shoot we attend. This request will contain Forename, Surname, class, year, and admission number for portrait shoots and class names and class pupil numbers for group photographs.
2. How is the data received?	From January 2018 we will be asking schools to upload the data direct through the school portal. Other methods of data transfer such as email have been proved to be less secure.
3. What is this data used for?	Portrait data is used for assigning images to pupils for use with all school databases. It is also used for accurate pupil tracking for orders, and internal shoot administration.
4. What if we do not wish to send name data for portraits?	This is not a problem; there will be no issue in taking the photographs. We will not however be able to offer images for mass import to the school database system.
5. Do you store the data securely?	Yes.

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		The data is stored within the confines of the school user account.
6.	How long do you hold images for?	Images are held on a live internal server for no more than 3 years. Images are then compressed and archived for a further 1 year.
7.	Can you access the schools portal account through administration?	No. The only users that have direct access are defined by the school, and must have a the same domain as the primary user (school)
8.	Does the image itself hold the pupil name in the metadata?	No. We have deliberately not used the image metadata to store the pupil information. This way as a stand alone JPEG image there is nothing that indicates the name of the pupil.
9.	Who has access to the data?	All JSSP staff have access to the images and data and each staff member is subject to a DBS check.
10.	How often are DBS updates processed?	We re-check staff every 3 years
11.	What are the technical security measures in place once the data is obtained?	Each member of staff has a unique password to access to the servers, websystems and customer databases. We hold Geotrust SSL certificates to ensure secure ://https connections when using the School Portal, JSSP Administration system and customer facing website. The JSSP admin system access is secured with username, password and 2-factor authentication.
12.	When is the data removed from servers?	Images are archived after each season, and any pupil data documents are deleted from the internal servers twice a year.
13.	Do you use 3rd party software, and if so, what are the security measures they have in place?	No. All the software that we use for our images and data management is built specifically for us and the sole use of JSSP ltd
14.	Are pupil images held on computers?	No. Images and data are never downloaded to individual computers.
15.	Can individual pupil images be removed from our systems?	Yes. At any given time we are able to remove pupil images as a specific request to mail@jssp.co.uk

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Online systems

16. When obtaining personal data through web ordering, what data do you hold?	Our web ordering system holds personal account information only when an order is placed. The user can delete this at any time.
17. Do card payment details remain on JSSP Servers?	No. Card payment information is entered directly to the sage website and never enters our domain.
18. Do you use images for promotional use?	No. Only if images were specifically consented by the parent when ordering would we use an image for marketing purposes.
19. What are the access rights for image viewing online?	Images can only be accessed with the 11 digit UID. Each code is none sequential random code with 16 billion possible combinations. Once an image is accessed, that parent becomes the access controller.
20. Do you share the parent data with any 3rd parties?	No. We never share any data with 3rd parties.
21. Where are the offsite servers located?	Webservers are located in London. Images are kept on Amazon S3 servers located on Dublin.

Customer database – School specific information

22. Where is the schools contact information	We hold all data on our servers onsite.

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held?	
23. Is this information accessible via the internet?	No. The servers are offline and not accessible by the internet.
24. Who has access to this information?	All JSSP staff has access to the images and data and each staff member is subject to a DBS check. 1x 3rd party technician.
25. What security measures are in place to protect the data from theft?	All users have a unique password to enter the system. At a predefined point of each evening every user is signed out.

Backups

26. Do you run offsite backups?	Yes. We run a nightly server backups to Amazon S3 (Dublin)
27. Who has access to the backups?	The backup is not accessible without the single encryption key and is designed to only be accessed in the event of a 100% data loss from the main onsite server. EG. fire

3rd Party Access

Do you have 3rd party services with access to the data?	Yes. We have 2 sources of technical assistance. Both are contracted suppliers and have service level agreements in place.
Do the 3rd party technicians hold any of the data outside of the systems platforms?	No. All customer data remains within the secure platforms at all times.

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Sharing agreement

- The data that we request and use will be solely for the purpose of our photography visit.
- At no point will the data be shared with any 3rd party outside of the orginal remit
- Data will be held and destroyed as described in this document and regularly updated in line with current ICO guidelines

SIGNED for and on behalf of
Jane Stapleton Photography Ltd

By:

Name: Steven Deverill...

Title: Company Director ....

SIGNED for and on behalf of …………………………………………………………………………………..
By:

Name:..

Title:...