

Processing of personal data to provide technical support for CASPA under the General Data Protection Regulation (GDPR)



Introduction

This document relates exclusively to situations where, in order to resolve a CASPA support query, files containing personal data relating to your CASPA installation may be required by RSE Insight Ltd in order to replicate an error, amend your data, or otherwise to resolve the issue.

For information about the implications of the GDPR on your use of CASPA in all other circumstances, please refer to '[CASPA and the General Data Protection Regulation](#)' document, available on the CASPA website www.caspaonline.co.uk.

Data required by RSE Insight Ltd for the purposes of technical support for CASPA

In the rare circumstances where technical support issues cannot be resolved by guidance via email or telephone, files from or relating to your CASPA installation may be required in order to allow RSE Insight Ltd to attempt to replicate an error that we cannot identify or replicate with our own data, to amend data files that are corrupted or have been modified in error, or to otherwise assist us in resolving the issue.

Such files may include database files from CASPA, files containing data you are attempting to import into CASPA and files containing data exported from CASPA. In all cases, these files may contain both [Personal Data](#) and [Sensitive Personal Data](#).

GDPR and contractual arrangements for the processing of data by RSE Insight Ltd

When processing such data, RSE Insight Ltd will be acting as a [Data Processor](#) on behalf of the organisation using CASPA – the [Data Controller](#). In order to be compliant with the GDPR, Data Controllers must only appoint Data Processors who can provide 'sufficient guarantees' that the requirements of the GDPR will be met and the rights of data subjects protected.

In order to protect the interests of both the Data Controller and the Data Processor, a written contract will be required between your school and RSE Insight Ltd that covers every instance where the Data Controller provides RSE Insight Ltd as Data Processor with files containing Personal Data or Sensitive Personal Data.

RSE Insight Ltd is preparing a specimen contract for the commissioning by the Data Controller of Data Processing activities by RSE Insight Ltd. This document will include all information necessary to demonstrate compliance with the GDPR by RSE Insight Ltd.

As noted previously, the data to be processed may include sensitive personal data; in order for the Data Controller to comply with the requirements of the GDPR relating to the processing of personal data, all such processing must have a lawful basis; the only lawful basis available to a school for the

processing of sensitive personal data is the consent of the data subject which must include consent to processing of their data by a third party Data Processor.

The specimen contract will therefore require the Data Controller to demonstrate such consent to RSE Insight Ltd as Data Processor and to indemnify RSE Insight Ltd from any actions arising from an alleged lack of consent or the lack of consent to processing of such data by a Data Processor.

If the school is unable to demonstrate the consent noted above, we will be unable to accept the files as processing the data would place us in breach of the GDPR. This may prevent us from resolving the support query.

Transmission of data to and from RSE Insight Ltd

The files relating to CASPA that RSE Insight Ltd requests for support purposes may contain both personal data and sensitive personal data. When sent to us, files containing personal data or sensitive personal data must be sent securely, ideally using a secure data transfer tool such as the Government's S2S service. In those circumstances where a school does not have access to the Government's S2S service, or any other secure data transfer service, any data sent by email must be encrypted to AES 256 bit standard using a strong password and the password should be provided either by telephone or separate email.

It should be noted that not all data files requested by RSE Insight Ltd will contain Personal Data or Sensitive Personal Data; for example, files relating to system configuration do not contain personal data and are thus outside of the scope of the GDPR and can be emailed without further encryption. We will advise when this is the case.

Retention of data provided for support purposes by RSE Insight Ltd

Data sent to us is required only for the duration of the support issue. We will therefore request confirmation from the school that the issue is resolved, at which point we will delete the data from our IT equipment and any printed output from the data will be securely destroyed within two working days.

If no confirmation is received within fourteen days, we will delete the data from our IT equipment and any printed output from the data will be securely destroyed within a further two working days.