



INNOVATIVE
SCHOOL
ADMINISTRATION

VSware Privacy Statement

VSware respects your privacy. This Privacy Statement outlines your rights to privacy and our commitment to safeguarding your personal data. VSware's ambition is to be fully transparent in our privacy practices and the choices you can make regarding your personal data that is processed by VSware.

Our privacy policies and guidelines respect and comply with the European Union General Data Protection regulation. All major decisions regarding privacy in VSware are made at a corporate level.

This Statement is available on our vsware.ie home page.

Scope and acceptance

The Statement provides information about data processing carried out by VSware on behalf of our Customers based on their instructions (the Customer as data controller and VSware as Data processor).

Personal data is information that can identify you as a person, such as an email address, street address or phone number. Processing your personal data is necessary for us to serve our Customers.

By providing us with your personal data, you accept the practices and terms described in this Privacy Statement. Please do not use VSware Sites or provide your personal data if you do not agree.

Whose data we process

VSware process data about jobseekers, contact persons and software users among our Customers, including persons representing potentially new Customers that approach us via our website or other channels. Our statement in these regards is to be found in the data controller section.

We also process data about our Customers' employees and Student's data of which the Customer controls. Our statement in these regards is to be found in the data processor section.

In this Statement data subjects may also be referred to as **persons or you**.

Why we process your personal data

To manage our Customer relations in general and to meet our Customer commitments, VSware requires some information about you in your role as Customer contact person or user of a service. Our aims with this are:

- Provide offers on programs and services that Customers or prospective customers have requested
- Inform about and present program and service offers that are closely related to the services and programs the Customer already uses.
- Perform deliveries in accordance with a customer agreement
- Offer support to users of our programs and services
- Improve the quality of our programs, services
- Detect and prevent security threats and perform maintenance and debugging
- Prevent abuse of our programs and services
- Communicate information that is relevant for our deliveries in particular and our customer relations in general
- Process orders, invoicing, payments and other financial follow up of Customers
- Payment of programs and services purchased through VSware.

Processing according to the above listed purposes is necessary for us to manage our customer relations. Therefore VSware do not, as additional ground ask for your consent to process your personal data. We do not consider that the processing disadvantages you in any way.

In addition, we will also collect information about you as a contact person or user of a service, for the following purposes:

- To manage your access to our web-based services (cloud services)
- To promote new products and services

The basis for Vsware's processing of personal data for the above purposes is based on your voluntary consent. Your consent may be given freely when applicable. Please note that the collection of individual personal data is required in order to gain user access to many of our programs and services and also to access the information you have requested.

How we collect your personal data

In general, VSware collects data directly from you or other persons linked to the Customer company where you are employed. These persons may be a manager or colleague.

What personal data we process

The type of data that VSware process about you may be:

- Your own and the Customer's contact details such as name, address, telephone number and email.
- Information about date of birth, age and gender
- Employment information about you at the customer company such as job title, position including preferences and interests in professional context
- Feedback, comments or questions about VSware as a supplier, or concerning our programs and services
- Content you have uploaded such as photos and documents
- Unique user information such as login ID or username
- Traffic information as provided by your web browser such as browser type, language and the address of the website from which you arrived and other traffic information such as IP address
- Clickstream behaviour such as which links you click and when

We may also in some cases compare a collected IP address with a geographic map service to derive your general location.

If you make a post, comment or similar on any public forum or VSware Site, such information can be read and used by anyone with access to site and used for purposes over which neither VSware nor you have control. VSware is not responsible for any information you submit on such forums or VSware Sites. VSware will not post any comment, testimonial or similar made by you without your prior consent.

How we share your personal data

VSware does not share your personal data with third parties who intend to use the data for marketing purposes.

VSware may share your personal data with third parties for other purposes but only in the following contexts:

Business partners

VSware may share your personal information with our partners in the event this is legitimate from a business perspective. For example, if you purchase a program or service on behalf of your employer that we provide through one of our certified partners.

Public Authorities

The Gardaí and other authorities may demand the handover of personal information from VSware. In these cases, VSware will only hand over the data if there is a court order to do so.

Your rights

When your personal data is processed by VSware, some of the right's you have are:

- You can request all of the data that VSware hold's on you by submitting a "Subject Access request" in writing, we will then send you a record of all the data we hold in a commonly used and accessible format.
- You have the right to restriction of processing.
- You have the right to have your data rectified if incorrect.
- You have the right to have your data erased, this will only apply if your consent is required for holding this data instead of a legal requirement.
- You have the right to have all of your data from VSware given to you in a commonly used format to enable you to move to another provider.

Data security and retention

How we keep your personal data secure

Vsware takes the trust you place in us seriously. Vsware is committed to prevent unauthorized access, disclosure or other deviant processing of your data. Further, VSware is committed to ensure proper use of the information, to maintain data integrity and to secure data availability. As part of our commitment, we utilize reasonable and appropriate physical, technical, and administrative procedures and measures to safeguard the information we collect and process. VSware has implemented a number of security measures, including:

- **Secure operating environments** - VSware stores your data in secure operating environments that are only accessible to VSware employees and subcontractors on a need-to-know basis. VSware also follows generally accepted industry standards in this respect.
- **Encryption of payment information** - VSware uses industry-standard encryption to provide protection for sensitive financial information, such as credit card information, sent over the Internet.
- **Prior authentication for account access** - VSware requires its registered users to verify their identity (e.g. login ID and password) before they can access or make changes to their account in order to prevent unauthorized access.

Please note that these protections do not apply to the personal data that you choose to share in public areas such as community websites.

How long we store your personal data

VSware will only retain your personal data for as long as necessary for the stated purpose, while also taking into account our need to answer queries or resolve problems and to comply with legal requirements under applicable laws.

This means that we may retain your personal data for a reasonable period after your last interaction with us. When the personal data that we collect is no longer required in this way, we destroy or delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymized.

VSware as data processor

VSware provides many different services to our Customers. These services involves processing of the Customers' data and may include processing of personal data. The purposes of this processing is determined by our Customers and not by VSware. The Customer is then the data controller for the data subject's data. VSware do in such cases act as data processor and process the data on behalf of and according to instructions given by the Customer. When acting as data processor, VSware is in accordance with the requirements in applicable data protection legislation always committed to enter into a data processing agreement (DPA) with the Customer. The Customer has agreed and guaranteed that:

- The Customer is the owner of or otherwise has the right to transfer the data to VSware for processing and that he has the responsibility for the accuracy, integrity, content, reliability and legality of the personal data
- It is the Customer's duty as data controller to notify, to the extent required by applicable law, the relevant supervisory authorities and/or the data subject in the event of any breach or unauthorized disclosure of personal data

When acting as data processor, VSware is responsible for providing technical and organizational security measures in order to safeguard your privacy on behalf of our Customer - the data controller.

As data processor, VSware will not process personal data in any other manner or for any other purpose than as authorized in the agreement with the data controller.

Data subjects having questions, comments, claims or any other issues regarding their personal data that VSware is data processor for, must submit these to the data controller.

As data processor, VSware will not give any data subjects access to their personal data without instructions given by the data controller to do so.

If governmental authorities or the Gardaí request disclosure of personal data, VSware will promptly notify the data controller and we will disclose such data only to comply with a court order.

Subcontractors and export of personal data

In some cases, VSware will use subcontractors to process personal data, and we may export your or our Customers data outside the EU. These subcontractors are typically vendors of cloud services or other IT hosting services. When using subcontractors, VSware will always enter into a data processing agreement (DPA) in order to safeguard your privacy rights and/or to fulfil our obligations towards our Customers.

If the processing of data is performed outside of the EU, we will make sure that the DPA is based on the EU Standard Contractual Clauses or that the data importer is certified according to the EU/US Privacy Shield framework, if located in the US. In such cases, we will also inform our Customers about the export of data. VSware is not responsible for providing such information to data subjects whose data is controlled by our Customers.

The Last update of this Privacy statement was May 16th 2018.

How to contact us

We value your opinion. If you have any comments or questions about our Privacy Statement, any unresolved privacy or data use concerns that we have not addressed satisfactorily, or concerning a possible breach of your privacy, please contact us on 015549628 or support@vsware.ie

This policy has been approved & Authorised by:

Name: Kate fox

Position: Data protection manager

Date: 16th May 2018

Signature: *Kate Fox*