



Privacy Notice

Here at A Star Attendance Solutions Ltd we take our responsibilities to protect the privacy of your data very seriously and recognise our responsibility to handle, manage and secure your data appropriately and legally. We operate in compliance with the European General Data Protection Regulation (GDPR) 2016 and Data Protection Act 2018 (UK).

A Star are the Data Controller for the personal data we collect about our employees, business contacts, clients, potential new employees, and we are the data processor for the school attendance data that we process on behalf of our clients (schools).

This privacy notice explains what you can expect when A Star collects and processes personal information.

Summary

- We keep the information we hold and process to a minimum.
- We use the data to provide our services to you, meet our legal obligations, and improve our website.
- We [delete the data](#) when it is no longer needed for these things.
- Generally, we [do not give your information to third parties](#), but there are some exceptions.
- We take [Information Security](#) very seriously.
- We do not record telephone calls, but we will log calls made and received.
- We will not share your information with any other company or organisation unless required to by law or at your request and we will not sell your information.
- Your data will not be held outside the EEA [but may be processed outside the EEA](#).
- We use website cookies.
- We are happy to [answer your questions](#) about any of this.

Want more detail?

To see more about how we use personal data, read the notice or notices which apply best to your relationship with us:

[Visitors to our website](#)

[Schools who use our services](#)

[Prospective clients](#)

[Potential employees](#)

ICO registration

A Star is registered with the Information Commissioner's Office (ZA545883).

Your rights

You have the following rights regarding your privacy and your personal data:

- To be informed and understand how your data will be used, secured and managed.
- To access your personal data we hold about you and understand how we process it.
- To have your data kept accurate and up to date and to be disposed of securely when no longer required.
- In some circumstances, restrict our processing of your data, and or to request we erase your personal data where this is appropriate.
- To object to our processing or withdraw previously given consent.

Not all rights will apply to all processing, however if you want to discuss or exercise any of these rights please just contact us.

Contact us

If you have any questions or concerns about this Privacy Notice or how we handle your personal data, please contact us:

Jill Robson (Director)

c/o Oxclose Children's Centre

Oxclose Primary Academy

Brancepeth Road

Washington

NE38 0LA

+44 07388551293

(We do not record our calls)

Jill.robson@astarattendance.com

If you remain dissatisfied you have the right to seek independent review from the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 1st June 2020.

Information Security

At A Star we take security seriously and we are committed to continual improvement and aligning to information security best practice.

We will store, process and transmit (when necessary) your information securely, we will do this using encryption and recognised appropriate security controls. We will ensure our employees respect your data and your privacy and when no longer required we will dispose of your data in a secure manner using recognised deletion and sanitisation techniques, cross cut shredding or an appropriately vetted disposal contractor. We will not hold your data on portable media such as usb drives.

We use Microsoft 365 services and our email is secured using Transport Layer Security (TLS) to appropriately encrypt email communications. We strongly encourage you to ensure the same to ensure communications between us are secure.

If you have particular security requirements, please [contact us](#) to discuss how we can support you.

Data retention

Data Type	Retention Period	Reasoning
Pupil Attendance Data	Duration of Contract +1 Months, return to school when contract ends	Provision of contract to schools
Business Contact Data	Length of business relationship +3 years	Business requirement for reference, marketing and communication
Financial Data	7 years	HMRC Requirements

Further detail on specific retention periods can be provided on request.

Third parties

We will not transfer your personal data to third parties for their use or purpose without your permission, except in the following circumstances:

- If required to by law or court order
- If you do not pay your bills, we may choose to engage a third party to recover any money you owe us. We've never done this, but we want to keep this option open to us.

However we do have a small number of companies providing services to us and they process your data on our behalf:

- Microsoft (Office 365 in UK/EEA, Azure in UK/EEA) (Data centre Providers)
- Waterstons (Software Development & Support) (EEA and Australia(with Restricted Transfer agreements in place)
- Groupcall (API for system data transfer)(UK)
- MailJet (Email notification service in system) (EEA)
- Shred Centre (Secure Paper Disposal) (UK/EEA)
- Urban River (Public Website Hosting) (UK)
- Lyons Watson (Accountant)(UK)
- Archers Law (Legal Partners)(UK)

Our office space is within a Oxclose Primary school as below, however they would not have access to your data; they simply provide us with office space, network/internet connectivity and onsite device to permit access to the internet, secure paper disposal whilst onsite.

Visitors to our websites

- **What we hold**

We may generate log files from our systems: this will include an IP address assigned to you or, more likely, to someone who provides you with Internet access.

We collect some analytics cookie information when you visit our websites.

- **Using your information**

Dealing with enquiries – We keep a record of enquiries received, to help us plan our business strategy and check that we are offering what potential clients want. We may also use your contact details to inform you of related products or services you may be interested in, however you can opt out at any time.

GDPR Legal Basis for processing:

Art. 6(a) Consent if you have asked us to provide you with information on a product and service and provided us with your details.

Art 6(f) Legitimate interests of A Star to generate business by maintaining contacts, generating proposals and communicating with prospective clients regarding their requirements. If you have previously requested information we may send you information about related products and services we offer (Marketing); however you can object to this at any time and we will add you to our suppression list and cease sending you such Marketing Communications.

Security and performance – A Star uses a third party service to help maintain the security and performance of the A Star website, as well as to determine website visitor behaviour and help us plan our business strategy, this helps us tailor our services and ensure they are relevant to our prospective client's needs. To deliver this service it processes the IP addresses of visitors to the A Star website.

Use of cookies by the A Star website

When someone visits www.astarattendance.com we use a third party service, [Google Analytics](#), to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

You can read more about how we use cookies on our [Cookies](#) page.

GDPR Legal Basis for processing:

Art. 6(f): Legitimate interests where it is in the business interests of A Star to secure our IT infrastructure, improve the services we offer and gather data to aid business strategy planning.

Schools who use our services

- **What data we hold**

As our client we will hold the following information about you and your pupils:

School Contacts	Pupils
<ul style="list-style-type: none">• Names, job roles and contact information of your employees• Information about your business activities and in some cases your clients/customers• Information and documents about your matters or enquiries, including communications with you• Billing and payment information	<ul style="list-style-type: none">• Childs details (school ID, Name)• Parents/Guardian details (such as name, Tel number)• Addresses• DOB• School attendance details• Information individuals provide for onward referrals (only with written consent)• GP details/ Health Information(in some cases)• Copy letters• Supporting information or notes regarding attendance.

- **Using your information**

We use the information we hold about you and your pupils to provide or school attendance services to you to assist you in improving school attendance and supporting families; to communicate with you regarding the services we are providing to you or to inform you of other related products or services you may be interested in.

We also use your information to bill you, and keep track of payments.

GDPR Legal Basis for processing:

Legal basis for processing **pupil attendance data** will be the responsibility of the school as data controller but is expected to be :

Personal Data

Special Category Data

<p><i>Schools Legal basis is likely to be:</i> 6(1)(c) <i>Legal Requirement (In the event required to by law)</i> 6(1)(e) <i>Public Task</i></p>	<p><i>Schools Legal basis/condition for special cat data such as health reasons is likely to be:</i> 9(2)(g)(6) <i>Substantial public interest (Statutory & Government processes)</i></p>
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A Star's processing for billing and managing our client arrangement with schools will be:

Art. 6(b) Contractual requirement to fulfil our contracts with you and communicate with you regarding that contract for services.

Art 6(f) Legitimate interests of A Star to generate business by maintaining contacts, and communicating with our clients regarding their requirements and making you aware of other related products and services you may be interested in (Marketing); however you can object to this at any time and we will add you to our suppression list and cease sending you such Marketing Communications, you may still receive service related communications. If the need arises we may also rely on legitimate interests for the recovery of unpaid debts.

Prospective Clients

- **What data we hold**

If you contact us, we will hold the following information about you:

- Your name, identity and contact information
- Information about your business activities
- Information and documents about your enquiries, including communications with you

We also generate log files from various servers: this will include an IP address assigned to you or, more likely, to someone who provides you with Internet access.

- **Using your information**

We use the information we hold about you and your business to provide the best service we can, to communicate with you regarding services you may be interested in and to inform you of other related products or services you may be interested in.

GDPR Legal Basis for processing

Art. 6(a) Consent if you have asked us to provide you with information on upcoming events and related news via our mailing list.

Art 6(f) Legitimate interests of A Star to generate business by maintaining contacts, and communicating with prospective clients regarding their requirements. If you have previously requested information we may send you information about related products and services we offer, however you can opt out at any time.

- **Dealing with enquiries**

If you give us a ring or make contact by email, we will follow up on your enquiry and see if there is a way in which we can help you. We keep a record of enquiries received, to help us plan our business strategy and check that we are offering what potential clients want.

GDPR Legal Basis for processing

Art 6(f) Legitimate interests of A Star to generate business by maintaining contacts, generating proposals and communicating with prospective clients regarding their requirements. If you have previously requested information we may send you information about related products and services we offer, however you can object to this at any time

and we will add you to our suppression list and cease sending you such marketing communications.

Technical data

We may use the logs from our servers to help maintain security, as well as to determine website visitor behaviour and help us plan our business strategy. This helps us tailor our services and ensure they are relevant to our prospective client's needs.

GDPR Legal Basis for processing:

Art. 6(f): Legitimate interests where it is in the business interests of A Star to gather data to aid business strategy planning.

Potential Employees

- **What data we hold**

If you contact us to apply for employment, we will hold the following information about you:

- Your name and contact information
- Resume including qualifications, education and previous experience and employers and your referees contact details, as well as anything else you choose to tell us.

If you submit electronically we may also generate log files from various servers: this will include an IP address assigned to you or, more likely, to someone who provides you with Internet access.

- **Using your information**

Considering your application for Employment – We will use your resume or any information you or a recruitment agency provide to us to consider you for employment. If you are unsuccessful we will retain this information for 12 months after the recruitment exercise has ended and then they will be securely destroyed. If you are employed these will become part of your personnel file.

GDPR Legal Basis for processing

Art. 6(a) Consent if you have applied for employment, we will use these to consider your application.

Art 6(f) Legitimate interests of A Star to securely and fairly manage recruitment to ensure we employ the right people for our company and we will use your details to make the appropriate checks.

ID Vetting checks – If you are offered a job we will need to carry out verification check on you. We retain identity verification information for as long as you are an employee.

GDPR Legal Basis for processing:

Art. 6(a) & 9(2)(a) Consent for external vetting checks.

Art. 6(c): Legal obligation where we have to do this processing to comply with legal and regulatory obligations relating to your right to work in the UK.

Art 6(f): Legitimate interests where it is in A Star's interests to ensure prospective employees are appropriately vetted.

Technical data – We may use the logs from our servers to assist in our firm's security, as well as to determine website visitor behaviour and help us plan our business strategy, this helps us tailor our services and ensure they are relevant to our prospective client's needs.

GDPR Legal Basis for processing:

Art. 6(f): Legitimate interests where it is in the business interests of A Star to gather data to aid business strategy planning and ensure our systems are protected.

Cookie Notice

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently and to permit your experience to be more tailored to your preferences. They also are used to provide information to the owners of the site. The table below explains the cookies we use and why.

Google Analytics

A Star use Google Analytics to understand how our website is being used and accessed and identify new or returning visitors or how the visitor found our website. This is a website analysis tool provided by google, as part of this service google may store data about your use of our site including your computers IP Address on their systems in the USA.

You can opt out of being tracked by Google Analytics across all websites to do this please visit <http://tools.google.com/dlpage/gaoptout>.

How do I change my cookie settings?

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Cookie Name	Default Expiration Time	Description
__utma	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	10 minutes	Used to throttle request rate.
__utmb	30 mins from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.

__utmc	End of browser session	Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.
__utmz	6 months from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
__utmv	2 years from set/update	Used to store visitor-level custom variable data. The cookie is updated every time data is sent to Google Analytics.

More information on Google Analytics cookies can be found at

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage#gajs>