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# October Resolutions Limited

## GDPR, Privacy & Security Statement

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Version 1.1 26/4/18

Last reviewed 31/1/23

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### Overview

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This document outlines our policy for the storing, processing and disposing of data.

### Glossary of Terms

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Software – one of our programs; *TimeTabler*, *Options*, *StaffCover* or *TOOLS*  
School – the school registered to use our Software  
User – the person at the School who uses our Software  
ORL – October Resolutions Limited (us); Company No.: 3416996

### Nature of business

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ORL provides software to Schools. More details here: [www.timetabler.com](http://www.timetabler.com)

### Storing and Deletion of data

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School information is ordinarily stored with the Software, at the School. We would only see it if the User sends it to us, so we can look at a problem you are having, or to answer a question about your timetable. This information is low-level, and does not include home addresses, home telephone numbers, photographs, etc.

Any data you provide to us in this way, is deleted after your question is answered.

The only exceptions to this may be if:

- a) the User submits a request to our WishList system, and provides data which will be used to test the feature when it is added,

- b) the User submits his/her data to our Support Centre attached to a ticket. Tickets are ordinarily kept (securely) in order to build-up a History for the User (for both the User's and ORL's benefit in helping the User).

However, any such data will be deleted immediately, upon the User's request.

Users of our software usually subscribe to our monthly newsletter on timetabling. To this end, that User's name and the email address s/he provided will be stored in our Customer Databases, but you can ask to be unsubscribed at any time.

Information may occasionally be shared with your MIS / Admin System supplier / consultant who is helping you; the User will be aware of this and such third-parties will follow their own GDPR policy.

Any User or School can at any time ask for details of what information ORL currently holds about them.

We have anti-virus and anti-spam software installed on all our computers and email clients. This is run on every email we send, and on every new version of our software we release.

From time to time, one of our computers may become obsolete, in which case its hard-disc is destroyed by a specialist company who is registered with the Information Commissioner's Office. A certificate of destruction is provided to us.

## Our promises to you

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We promise to:

- only use data that you send to us, and only for the specific purpose you sent it
- to destroy your data once we have finished using it
- not pass your data to any third party
- use and keep updated safeguards around data handling and secure data processing
- keep all our staff aware and compliant with these safeguards
- remove you from our newsletter if you request it
- in the event of a breach of security coming to our attention, to let you know asap (by email to our contact)

## Information Commissioner's Office

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We are registered with the ICO, whose details can be found here: [www.ico.org.uk](http://www.ico.org.uk)

Registration reference: ZA334484.

## Contact details

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The person at ORL responsible for maintaining privacy is:

Name: Mr Christopher Johnson  
Title: Director  
Email: [data@timetabler.com](mailto:data@timetabler.com)  
Company: October Resolutions Limited  
Address: Chadwick House, Birchwood, Warrington WA3 6AE

## Compliance with Article 28

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How we work within GDPR Article 28 appears in Appendix A below.

## Any Questions ?

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If you have any questions at any time, please send them to Chris Johnson at [data@timetabler.com](mailto:data@timetabler.com) .

## Appendix A : How we work within GDPR Article 28

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We work within GDPR Article 28 as follows:

Requirement	Compliant ?
28(3)(a): "processes the personal data only on documented instructions from the controller"	Yes, we will only process your personal data with your consent.
28(3)(b): "ensures that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality"	Yes, all employees of ORL have signed a confidentiality agreement (see Appendix B).
28(3)(c): "take all measures required under the security provisions (Article 32)"	Yes, we take all required security measures, as described above.
28(3)(d): "only use a sub-processor with the consent of the controller"	Yes, we ensure this.
28(3)(e): "assist the controller in responding to requests from individuals exercising their rights, pursuant to Articles 32-26"	Yes; please send any questions or requests for information to the 'Contact Details' provided above.
28(3)(f): "assists the controller in ensuring compliance"	Yes; please send any questions or requests for information to the 'Contact Details' provided above.
28(3)(g): "at the choice of the controller, deletes or returns all the personal data to the controller after the end of the provision of services"	Yes, we will delete data as required – see "Our promises to you".
28(3)(h): "makes available to the controller all information necessary to demonstrate compliance"	Yes, we will respond promptly to any request for such information.

All employees have signed the following agreement to protect data:

## October Resolutions Limited

# Employee Non-Disclosure & Confidentiality Agreement

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School	– any school registered to use our Software
User	– any person at the School who uses our Software
ORL	– October Resolutions Limited (us); Company No.: 3416996
Partner	– any supplier or partner of ORL, or anyone ORL supplies a service to

### Agreement

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I promise to:

- never remove from ORL, or store outside of ORL, or disclose to any unauthorised person, any School or User or Partner data (whether in digital, physical, or any other form).
- never reveal or pass on to anyone outside ORL, any information about ORL and/or its Software, and/or its Schools, Users or Partners, unless this information is already in the public domain.
- report any breach of security, to the designated person in ORL, who is currently Chris Johnson.
- delete any data if requested to by the data controller.
- abide by all sections of the ORL 'GDPR, Privacy & Security Statement' currently in force, a copy of which can be found in the ORL KnowledgeBase, and which I have read and understood.

I accept that these promises form part of my contract of employment, and that failure to comply with any would constitute a serious breach of that contract.