# Reading Cloud Security & Privacy Overview

Version: 1

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# Document introduction and scope

This document will provide you with privacy and security information relating to Reading Cloud. It does not provide information about associated services such as support or consultancy that may require ESS to process customer personal data.

As Data Processor Education Software Solutions (ESS) is not obliged to provide the information required by Article 13 or Article 14 of the UK GDPR (known as a privacy notice); this must be provided by the Data Controller. The Data Controller may also be required to complete a data protection impact assessment (DPIA). This document has been produced by ESS to assist with these requirements.

# Accountability

ESS provides you, the Customer, with the Reading Cloud platform. As your organisation is responsible for the personal data that is entered and maintained in Reading Cloud, this makes you, the Customer, or the organisation receiving ESS product licenses, the Data Controller. As Data Processor, ESS acts only in accordance with the Customer's documented instructions.

As Data Controller the Customer must be able to demonstrate compliance with the requirements of the UK GDPR.

*The Information Commissioner's Office website can be referenced for full details on responsibilities of data controllers and processors: https://ico.org.uk*

# Who is storing / processing information about my organisation?

Education Software Solutions
11 Kingsley Lodge
13 New Cavendish Street
London, England
W1G 9UG
Website: https://www.educationsoftwaresolutions.co.uk/

# Product overview

Reading Cloud is a leading library management system with an interactive online reading community for pupils. The software provides librarians with everything they need to manage the day-to-day running of their library, as well as the tools to support and encourage reading for pleasure.

# What personal data is stored within Reading Cloud?

Reading Cloud typically requires the following data:

- Forename
- Surname
- Gender
- Date of Birth
- Tutor Group
- Year Group

- Management System ID

## Data Retention Policy

- Customer data files will be destroyed within 180 days of the customer go-live for data conversion work. This is to allow for both school holidays and issues where corrections may be required
- Customer data will be hosted on the hosted platform for the duration of their contract
- Backups of customer data are held for 3 months while the customer has an active contract
- As part of the off-boarding process customers are contacted asking what they wish RC to do with their data.
  o Customer requires a copy of their data which is supplied, the original is then removed from the hosted platform.
  o Customer doesn't require their data; the original is then removed from the hosted platform.
  o Customer doesn't reply, data removed from the hosted platform after 6 months
- Hosted data held within our testing environment is checked every 90 days, if no longer required for support tickets/testing it is removed

## Where is my organisation's data hosted?

All Reading Cloud data for hosted customers is stored in Microsoft Azure Data Centres located in the United Kingdom.

## Who has access to my organisation's personal data?

Reading Cloud limits access to your data to those in our infrastructure, support, user acceptance testing and development teams. Reading Cloud employees are vetted according to the HMG Baseline Personnel Security Standard, and this is reviewed every three years.

Reading Cloud uses a range of trusted service providers to help deliver our services. All our suppliers are subject to appropriate safeguards and operate in accordance with our specific instructions and limitations. These service providers include:

- **Microsoft Azure** – to store your data.
- **Cloudflare Inc** – to optimise content delivery and provide security functionality.
- **Wonde** – to automatically transfer staff and student data from your management information system (MIS) to Reading Cloud.
- **GroupCall** - to automatically transfer staff and student data from your MIS to Reading Cloud.
- **OverDrive** – to provide access to eBooks from the Reading Cloud platform.
- **BioStore** – to provide biometric identification for staff and students within the Reading Cloud platform.
- **Peters Books** – an optional online bookshop service.

## What is the legal basis for processing my organisation's personal data?

As the Data Controller, it is the Customer's responsibility to define their legal basis for processing personal data within Reading Cloud.

ESS processes Customer personal data within Reading Cloud on the documented instructions of the Data Controller and to fulfil its obligation under the Agreement to provide a hosted service.

## What product usage/monitoring information do you collect when my organisation uses Reading Cloud?

Reading Cloud uses several 3rd party monitoring tools:

- **Microsoft Azure Application Insights** – to detect performance anomalies and diagnose issues. No personal data is processed by this tool.
- **Bugsnag** – to provide automated crash detection and alerting tools, as well as diagnostics dashboards. Personal data processed by this tool is limited to the IP address of the affected user.
- **Google Analytics** – to track website activity and source of traffic.

## How is my organisation's personal data collected and added into Reading Cloud?

Data can be imported into Reading Cloud as below:

- Manually, via the borrower's table
- CSV File import created manually or exported from the Customer's MIS
- GroupCall Connect
- Wonde RC Intake

## How can Reading Cloud support my organisation with its compliance to GDPR?

Reading Cloud includes the following features to support the Customer fulfilling Data Subject Rights requests:

- Right of Access by Data Subject – Reading Cloud supports the printing of borrower information direct to PDF.
- Right to Rectification – For Customers using the Reading Cloud automated system, information corrected in the Customer's MIS will be updated in Reading Cloud the next day.
- Right to Data Portability – Reading Cloud supports the export of data to CSV files (a structured, commonly used, and machine-readable format).

## Is there any functionality within Reading Cloud that supports automated decision-making? How does this functionality work?

Reading Cloud does not offer functionality specifically intended to support automated decision-making.

## Cookie information

Reading Cloud uses cookies to ensure the smooth running of the application by storing data relating to the library system and the library user currently logged on. These are session cookies and expire when the user logs off, or after a pre-defined period has elapsed.

## What controls are there within Reading Cloud to protect my organisation's data?

The following controls are implemented by ESS for the Reading Cloud product:

- Encryption (at rest and in transit) using industry standard configuration.
- Patch management.
- Firewalls.
- Anti-virus.
- Penetration testing, done regularly.
- Vulnerability scanning, done regularly.
- Disaster recovery and business continuity controls in place.
- Intrusion detection systems + Intrusion prevention systems.
- Regular access control reviews for ESS admin users.

In addition, Reading Cloud combines the features of CloudFlare and Microsoft Azure to bring a highly available and securely hosted library system to customers.

## How long do you keep my organisation's data, once we have off-boarded?

As part of the off-boarding process, Reading Cloud will request instructions regarding the disposal of library data. At your request, the data will be provided in a universal file format (CSV) to facilitate transfer to another product.

If no request is made, the data will be removed from all Reading Cloud systems – including backups – after 90 days. The data will be available for a further 35 days via the Microsoft Azure platform, after which they will be permanently deleted.