

Vericool Ltd GDPR Statement

Vericool is ISO 27001 and 9001 certified a demonstration of its commitment to data security and processing.

The EU GDPR establishes a harmonized framework within the European Union, the right to be forgotten, clear and affirmative consent and, amongst other things, serious penalties for failure to comply with these rules.

The Regulation 2012/0011 was adopted officially on 27 April 2016 It came into force on 24 May 2016 Member States had to transpose it into their national law by 6 May 2018 The provisions of the Regulation are applying as of 25 May 2018.

What is biometric data for the EU regulation? The EU data privacy law defines biometric data as "special categories of personal data" and prohibits its "processing".

More precisely, biometric data are "personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allows or confirms the unique identification of that natural person, such as facial images or dactyloscopic data".

The Regulation protects EU citizens and long-term residents from having their information shared with third parties without their consent. Their processing for "uniquely identifying a natural person" is prohibited. However, it does contain some exceptions:

- If consent has been given explicitly (this is the provision in most cases that we rely on)
- If biometric information is necessary for carrying out obligations of the controller or the data subject in the field of employment, social security and social protection law
- If it's necessary to protect the vital interests of the individual and he/she is incapable of giving consent • If it's vital for any legal claims
- If it's necessary for reasons of public interest in the area of public health. Moreover, the Regulation permits Member States to introduce other limitations regarding the processing of biometric information.

General note on GDPR for Schools re Vericool Ltd

Vericool Ltd is a provider of cashless catering and registration systems to schools. Vericool has a comprehensive internal policy on GDPR and has conducted a detailed audit together with staff training to ensure compliance.

All data for our systems is held in an encrypted sql either on the school central database or in the case of cloud hosted solutions on a secure cloud based system provided by the major provider.

Data is handled, processed and secured using best practice as part of our ISO 27001 certification.

On very rare occasions and with the explicit permission of the school we may bring some data back to Vericool. In the unlikely event this was necessary we have a dedicated and secure server. This server has a range of security measures including it not being connected to the internet, internally it is held within its own vlan. All data is hard deleted as soon as it is finished with and it is our policy to physically destroy the hard disk once a year.

We do not share any information with any third parties and conduct no marketing or data analysis using it.

Data Collected

Where the Vericool solution is hosted it maintains an encrypted data base at a high security data centre from a market leader employing the latest security techniques as would be expected with a company certified with ISO 27001. The following information is retained for as long as it is required and then destroyed 1 year after pupils leave school. The length of retention is reviewed from time to time.

Student:

- Email address
- FirstName
- LastName
- Year Group
- RegCode
- Admission Number
- Meal Transactions made in schools
- Biometric – no fingertips themselves are stored, a unique template is stored made up of a low grade string. This is encrypted and used end to end with the biometric reader.

Parents:

- Email Address
 - Password
- No credit card information is held by Vericool Ltd