



PRIVACY NOTICE

InVentry Limited

Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

1. Responsibilities

- 1.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to the school/client organisation collecting/processing their personal data.
- 1.2 All Employees/Staff of the school/client organisation who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

2. Privacy notice

2.1 Who are we?

InVentry Ltd has been the driving force in visitor management systems since 2010. What started out as the answer to an outdated paper based system, has now become the market leading sign in and visitor management system in the UK.

There are now over 4,000 schools using InVentry. Every week we handle more than 5.7 million sign in and out events (that's up to 49 every second) and capture over 146,000 visitor images.

More than 5 years on and we're still pushing the technology we use and the industry as a whole. This constant drive to keep moving forward was recently captured by InVentry being named the 21st Fastest Growing Technology Business in the North and being named in the Deloitte Fast 500.

We have now extended our sign in solution beyond education, serving customers in the private and public sectors as well as local government.

InVentry speeds up the sign in process, keeps identity information secure, and leaves schools feeling confident that their students and staff are safe.

Our Data Protection Officer and data protection representatives can be contacted directly here:

- dpo@InVentry.co.uk
- 0113 322 9253



The personal data we would like to process on your behalf is:

Personal data type:	Source (where InVentry Ltd obtained the personal data from)
Staff	
First name*	Provided by school and extracted from the InVentry system.
Surname *	
Time signed IN*	
Student	
First name*	Provided by school and extracted from the InVentry system.
Surname*	
Form group*	
Year group *	
Time signed IN*	
Time signed OUT*	
Reason for IN/OUT*	
Visitor	
Title*	Provided by school and extracted from the InVentry system.
First name*	
Surname*	
Company*	
Photograph*	
Vehicle registration*	
Name of host/person visiting*	
Time signed IN*	
ID badge service	
This service uses a set of data identified by the Data Controller and not specified by InVentry Ltd. By using this service, the responsibility for consent lies with the Data Controller.	
Support and fault resolution	
This is dependent on the issue identified and the work required to resolve the issue. It may require support to copy the whole database. Before removing data in any form, we will seek your additional consent to do so, either verbally or written, and take all steps to minimise its collection. This data is subject to a stringent internal policy and procedure ensuring that ownership and security of the data is recorded and maintained throughout the process. By design your InVentry system offers the ability to collect special category personal data in the form of biometric data (facial recognition/finger print recognition). If during the process of fault resolution, we are required to download the database from your system, we will treat it in accordance with the process described above and in line with our data sharing agreement.	
Should you so decide, you have the ability to add customised data fields that may include the collection of special category personal data. As the data controller, this is your decision and you should be aware that this will be shared with us. We will treat it in accordance with the above process and in line with our data sharing agreement.	
Marketing	
First name	This information will be requested from the customers on a consent basis.
Surname*	
Job title	
Email	
Mobile	
Landline	
Postcode*	



Personal data type:	Source (where InVentry Ltd obtained the personal data from)
SMS Service	
Mobile number	Provided by School, extracted from the InVentry System and used by the SMS provider only to facilitate this service.

Above fields marked with * are required for system functionality

The personal data we collect, depending on the role, will be used for the following purposes:

- Attendance
- Registration
- Emergency evacuation
- Badge Production
- Support and fault resolution
- Marketing

Our legal basis for processing for the personal data:

Article 6(1b)

- processing is necessary for the performance of a contract to which the organisation has agreed
- Section 537A of the Education Act 1996 – requires schools to maintain attendance records:
- The Regulatory Reform (Fire Safety) Order 2005 England and Wales - Requires an emergency evacuation plan that includes ensuring all those on site are safe accounted for.

2.2 Consent

The data controller is consenting to this privacy notice through the lawful processing condition of performance of a contract, upon the purchase of any of the following licenses; InVentry Anywhere, maintenance or integration. You are giving InVentry Ltd permission to process the personal data supplied specifically for the purposes identified. In doing so, InVentry Ltd must assume that the data has been collected under the terms identified in Article 6 'Lawfulness of processing' of the General Data Protection Regulation.

Where consent is required for InVentry Ltd to process both types of personal data, it must be explicitly given. Where we are asking you for special category personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting the Data Protection Officer at InVentry using the contact details above.

2.3 Disclosure

InVentry Ltd will not release the information to any third party unless the request is subject to legal obligation without obtaining the express written authority of the partner who provided the information.

2.4 Retention period

Your InVentry system will process personal data for the following periods:

- Primary pupils – In line with the school/organisations data retention policy
- Secondary pupils – In line with the school/organisations data retention policy
- Staff – In line with the school/organisations data retention policy
- Visitors – In line with the school/organisations data retention policy
- Marketing – Until consent is withdrawn



InVentry Anywhere Evacuation system

- Staff/Primary pupil/secondary pupil/visitors – Until 23:59:59 on day of attendance at site.

ID badge creation service

Any personal information supplied will be processed and stored as follows:

- Up 24 hours – InVentry Ltd tier 1 cloud storage facility.
- 51 days from dispatch of order, stored on local area network at our head office to enable completion and confirmation of order.

SMS Service

- InVentry system – 30 days
- SMS service provider – 6 months
- Telecom service provide – 12 months

The message and the number are stored for the above time frames by the SMS service provider for legitimate business reasons and the Telecom service provider as this is regulated under the Investigatory Powers Act 2016.

For more information on storage and processing security, please contact InVentry Ltd using the details above.

2.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be dealt with in line InVentry Ltd's Subject Access Procedure and will shared with the customer should a request come from directly a subject.

2.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by InVentry Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and schools/organisation's data protection representatives.



The details for each of these contacts are:

	Supervisory authority contact details	Data Protection Officer contact details
Contact Name:	Information Commissioners Office	InVentry Limited
Address line 1:	Wycliffe House	Unit 22-23
Address line 2:	Water Lane	Howley Business Park
Address line 3:	Wilmslow	Morley
Address line 4:	Cheshire	Leeds
Address line 5:	SK9 5A	LS27 0BZ
Email:	registration@ico.org.uk	dpo@InVentry.co.uk
Telephone:	0303 123 1113	0113 322 9253

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

Signature: *David Tidman*

Date: 15.12.2017