Data Processing Activities

1. Introduction

Project Q (trading as ac3 solutions limited) supports and adheres to the GDPR as required by law. This document lists the Data Processing Activities carried out as Data Processor on behalf of the Data Controller (schools) and Project Q's own Data Activities.

Purpose of processing	Categories of individuals	Categories of personal data
Data Controller *Staff administration*	*Employees* *Emergency Contacts*	*Contact details* *Contractual and Financial details* *Staff reviews/performance management* *Payroll (Third party)* *Contact details*
Data Controller *BDM / Sales*	*Customers*	*School contact details* *School Staff contact details* *(name/email/phone)* *Communication, activity and notes*
Data Controller *Suppliers/Orders*	*Suppliers*	*Company contact details and financial (bank)* *Company Staff contact details* *(name/email/phone)* *Communication, activity and notes*
Data Processor Project Q Service: Data Implementation	Customers	Student name, candidate number, email address and project work viewed within the Project Q Software
Data Processor Project Q: Data Backup	Customers	Project Q data (as above) *School contact details and financial (bank)* *Staff contact details (email/phone)* *Communication, activity and notes*
Data Controller Technical Support	Customers	*User contact details (name/email/phone)* Communication, activity and notes including reference to data in fault resolution

Retention

Purpose	Individuals	Retention & Security
Staff administration	Employees Emergency Contacts	3 years post-employment. Secured in locked filing cabinet. Restricted access. End of employment. Secured in locked filing cabinet. Restricted access.
BDM / Sales	Customers	3 years post-campaign. Encrypted storage, access controls Minimum account based details retained for financial audit trail
Suppliers	Suppliers	End of supplier relationship. Encrypted storage. Appropriate access controls. Minimum account based details retained for financial audit trail
Project Q Service	Customers	End of customer relationship, data is erased from our servers (approximately 90 days or if requested to do so earlier). Backup Data removed at the end of our retention cycles. Data is encrypted in transit, secured by access levels and encrypted in backup devices. Antivirus. Malware, firewalls and DDoS protection in place.

Contact Details
Alan Cree (DPO)

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This document was approved by A Cree, Director of Project Q (trading as ac3 solutions limited) on 10/08/2022 and is issued on a version controlled basis.

Signature: Date:10/08/22

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	A Cree	20.03.2019
2	Updated Activities	A Cree	10.08.2022