



PRIVACY NOTICE  
InVentry Limited

### 1.0 Scope

All data subjects whose personal data is collected, is done so in line with the requirements of the GDPR/Data Protection Act 2018.

### 2.0 Responsibilities

The Data and Safeguarding Manager is responsible for ensuring that this notice is made available to data subjects prior to the school/client organisation collecting/processing their personal data. 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.

### 3.0 Who are we?

InVentry 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 What started out as the answer to an outdated paper-based system, has now become the market leading sign in and visitor management system in the UK.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 21<sup>st</sup> 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](mailto:dpo@InVentry.co.uk)  
0113 322 9253

### 4.0 Data being processed

4.1 Depending on the services being requested/provided, the personal data we would like to process on your behalf is:

Personal data type:	Source (where InVentry Ltd obtained the personal data from)	Lawful Grounds
<b>Staff – For use of Evacuation App</b>		
First name*	Provided by School and extracted from the InVentry System	Article 6(1b) Contractual agreement
Surname *		
Time signed IN*		
Photograph (Only if controller includes this field)		



Position (Only if controller includes this field)		
<b>Student – For use of Evacuation App</b>		
First Name**	Provided by School and extracted from the InVentry System	Article 6(1b) Contractual agreement
Surname**		
Form group**		
Year group **		
Time signed IN**		
Time signed OUT**		
Reason for IN/OUT**		
MIS ID***		
AM/PM session mark***		
<b>Visitor – For use of Evacuation App</b>		
Title*	Provided by School and extracted from the InVentry System	Article 6(1b) Contractual agreement
First name*		
Surname*		
Company*		
Photograph*		
Vehicle registration*		
Name of host/person visiting*		
Time signed IN*		
<b>ID Badge service</b>		
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.		Article 6(1b) Contractual agreement
<b>Support and Fault resolution</b>		
<p>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.</p> <p>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.</p> <p>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.</p>		Article 6(1b) Contractual agreement
<b>SMS Service</b>		
Mobile number	Provided by School, extracted from the InVentry System and used by the SMS provider only to facilitate this service.	Article 6(1b) Contractual agreement
<b>Marketing (B2B only)</b>		
First name	For InVentry customers, this information will be requested from the customer on a consent or contract basis.	Article 6(1a) Consent
Surname*		
Job Title	For B2B, this information will be obtained via consent or from UK Data House under Article 6 (f) of GDPR. For more details see below.	Article 6(1f) Legitimate Interest
Email*		
Mobile		
Landline*		
Postcode*		



	As we sell via approved resellers, this data may be shared with an authorised reseller solely for communications around InVentry Ltd products once consent has been obtained.	
<b>Financial Information</b>		
First name	This information will be retained for 7 year, in line with financial information for completeness and accuracy of the record.	Article 6(1b) Contractual agreement
Surname		
Email		

Above fields marked with \* are required for system functionality, fields marked with a \*\* are required if using the full MIS register function of the InVentry Evacuation app. Fields marked with a + are not required for InVentry One systems.

4.2 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

4.3 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
- Article 6 (1f) - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party

## 5.0 Consent

5.1 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 and reflected in the Data Protection Act 2018

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 or directly through the link provided directly in any communication

## 6.0 Use of data for marketing purposes (B2B purposes only)

6.1 Data used by InVentry Ltd for marketing purposes is obtained in the following manner  
From the individual where consent has been obtained directly



From UK Datahouse (<https://ukdatahouse.com/>) Under Article 6(f) of GDPR - Legitimate Interest where the data has been confirmed to be eligible for use for these purposes and the Privacy and Electronic Commutation (PECR) guidelines.

## 6.2 Purposes and Intentions:

6.2.1 InVentry's purpose for processing and storing personal (B2B) data is as follows:

Increased awareness of the product in the market

The opportunity to present a demonstration of the system and potentially sell a system to the organisation (B2B environment only)

6.2.2 Engagement with organisations business only environment contacts to raise awareness of InVentry

- To arrange meetings to provide a demonstration for interested parties.
- To establish a frequency of contact that suits each individual business.
- Increased networking opportunities
- Growth of the business

6.2.3 InVentry's intentions in using business data are primarily:

- To engage with organisations business only environment contacts to raise awareness of InVentry
- To arrange meetings to provide a demonstration for interested parties.
- To enquire about and aim to establish a frequency of contact that suits each individual business.

6.2.4 Guidelines and Restrictions:

- InVentry will remove CTPS exclusions either prior to use or at once upon discovery of CTPS.
- No non-business email addresses i.e. @hotmail will not be used – they must be [name@company.com](mailto:name@company.com).
- All individuals at businesses will be given a clear route to opt out of future email communications and to apply their rights under current data protection legislation.
- Mobile numbers will not be obtained, recorded or used unless obtained through direct communication with any given business and given out by that business voluntarily to allow InVentry to attempt to contact a given individual.
- Data obtained for marketing purposes shall not be used for any other purpose

## 7.0 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.

## 8.0 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

#### 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.

#### Support desk

- Until no longer required under Article 6(f) – Legitimate Interest of the organisation for completeness of the record.

#### Financial information

- 7 years under Article 6(f) – Legitimate Interest of the organisation for completeness of the record.

#### Marketing

- For 12 months or until consent is withdrawn

### 9.0 As the Processor

All data hosted by InVentry Ltd is done so in compliance with the requirements laid in GDPR/Data Protection Act 2018.

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

InVentry Ltd will support the Data Controller in demonstrating compliance with the regulations covering the UK. Where required and reasonable, the processor will work with the data controller to;

- Cooperate with the relevant data protection authorities in the event of an enquiry
- Report data breaches to the controller without delay
- Help the controller to comply with data subject rights
- Assist the data controller in managing the consequences of data breaches
- Inform the controller if the processing instructions infringe GDPR/Data Protection Act 2018.

InVentry will takes all possible steps to ensure the security of the data where it processes this on behalf of the data controller. However, it cannot be held responsible or liable for the any breach of data that is beyond its control. All requests for additional assistance will be subject to the agreement of the Directors.



Should InVentry choose to change a 3<sup>rd</sup> party service, we will complete appropriate impact assessments, alter our privacy statement where appropriate and notify you of this change. Where an additional service is being provided, consent will be sought.

#### 10.0 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 InVentry Ltd 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 2.6 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.

#### 11.0 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:

	<b>Supervisory authority contact details</b>	<b>Data and Safeguarding Manager contact details</b>
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: 02.01.2019



## Appendix 1 - InVentry Processing

The following InVentry data hosting and processing locations are utilised for the purposes described below:

Service	System	Processing provider	Purpose/Justification	Location	Article 44 compliance (where required)
Evacuation service	InVentry Anywhere	Rackspace	Providing processing for evacuation service	EEA	Legally binding contract in place
Asset and compliance management	InVentry Asset and Compliance	Rackspace	Providing processing for asset and compliance service	EEA	Legally binding contract in place
Badge making	InVentry ID badge making	Rackspace	Providing processing for badge making transfer	EEA	Legally binding contract in place
Evacuation service	InVentry Anywhere	IBM	Providing processing for evacuation service	EEA	Legally binding contract in place
Support desk services	ZenDesk	ZenDesk	Recording details of support calls	EU/US	Article 46 - Standard data protection clauses adopted by the Commission in accordance with the examination procedure referred to in Article 93(2) And; Article 46 - An approved code of conduct/adequacy framework pursuant to Article 40 together with binding and enforceable commitments of the controller or processor in the third country to apply the appropriate safeguards, including in regards data subjects' rights. In this case this is the EU/US Data Shield. ( <a href="https://goo.gl/W2yp5m">https://goo.gl/W2yp5m</a> )
SMS messaging	Voodoo SMS	Voodoo	Sending SMS messages for visitor notifications	EEA	Legally binding contract in place
CRM	Dynamics	Microsoft	Customer management	EEA	Legally binding contract in place

All data stored in listed locations can be found in the following documents;

- InVentry Privacy Statement - <https://inventry.co.uk/gdpr-policies/>
- Please contact [DPO@inventry.co.uk](mailto:DPO@inventry.co.uk) for more details