

Information for Schools Completing Data Protection Impact Assessments (DPIAs)

Product name and description:	Focus on Sound – a music education software and learning resource
Company details:	Focus on Sound Ltd 14-15 Berners Street, London W1T 3LJ Company Registration – 07636545 ICO Data Protection Registration - ZA804802
Data Protection Officer name and email address:	Amber Badley Firebird Data Protection Consultancy Limited DPO@firebirdltd.co.uk
Privacy Notice:	Our 'Privacy Notice for Schools' can be found on our website at https://www.focusonsound.com/gdpr2
Data Processor Agreement:	Our 'Data Processor Agreement' can be found on our website at https://www.focusonsound.com/gdpr2
Who is the Data Controller for the school's data?	Your school is the Data Controller. We are your Data Processor, which means you have full control over your school's data when you use our music education software. We only process your data upon your written instructions and in line with the Data Processor Agreement.

Personal data being processed:

Account registration

We collect the following information about our customers when they sign up to our services:

- Name and work email address of the employee registering their school (e.g. the system administrator or head of music)
- Name and address of the school, finance officer's name and email (if supplied)

Microsoft Teams or Google Classroom Platforms

Our customers subscribing to Focus on Sound Pro can use Microsoft Teams or Google Classroom integration to manage their account and access our learning resources.

The following data is captured within the school's Microsoft Teams or Google Classroom platform, so the customer can register and manage user accounts, assign work to students and review their test results:

Customers (e.g. a system administrator and/or teacher)

- School name
- School ID (alphanumeric code)
- User IDs (alphanumeric code)
- First names
- Last Names
- School domain
- Class names taught by teachers accessing Focus on Sound
- Class IDs (alphanumeric code)
- Assignments/homework for Focus on Sound

Students

- School ID (alphanumeric code)
- User IDs (alphanumeric code)
- First names
- Last Names

- School domain
- Class names
- Class IDs (alphanumeric code)
- Assignments/homework for Focus on Sound
- Test results

Music First Application Cloud

Where customers sign up to the standard Focus on Sound subscription, they register and use a system called Music First Application Cloud (MFAC UK), to register and manage user accounts and access our learning resources. The personal data captured within this system are limited to:

Customers (e.g. a system administrator and/or teacher)

- School name
- Employee name and email address
- Username
- Class name(s) (where relevant)
- Password

Students

- School name
- First and last name
- Usernames
- Class name
- Password
- Work assignments from their teacher
- Test data (test title, test date, number of attempts, test result)

Access to your school's data	<p>Microsoft Teams or Google Classroom Platforms If your school uses either of these systems to access our software and learning resources, then only your school has access to your data (access privileges are set up and managed by your school). Focus on Sound cannot view any school data in those systems.</p> <p>Music First Application Cloud (MFAC UK) If your school uses the MFAC UK system to access our software and learning resources, then your school has access to your data, as well as a very small number of employees from Focus on Sound Ltd and MusicFirst Ltd (MFAC UK), so we can manage your subscription and provide administration support where needed.</p>
Where your data is stored	<p>We store personal data on Amazon Web Services (AWS) encrypted servers in London, UK.</p>
How your data is kept secure	<ul style="list-style-type: none"> • All personal data stored by us is held on encrypted servers in the UK • Your school has full control over who has access to your data within your school • Your school manages its passwords to our resources. Passwords are encrypted and only known by the user (except the initial password generated by us, which must then be changed by the user). The school is responsible for ensuring their employees and students understand how to keep their passwords safe. • If your school uses the MFAC UK system and you want us to upload your data onto this system on your behalf, you will transfer this data securely to us using OneDrive, a secure file sharing platform which has end-to-end encryption in place. Once uploaded to the MFAC UK system, we immediately delete the data held in OneDrive. • Only a very limited number of our employees or data processors have access to the data held within the MFAC UK system (max. 10 people). Access is restricted on a 'need to know' basis and only for service support or system maintenance purposes. These individuals are subject to confidentiality and are aware of their data protection and security responsibilities.

Amending or deleting your data

The school

Your system administrators can amend or delete the data and users within your Google Classroom or Microsoft Teams platform and within the MFAC UK system, at any time during your subscription. You can also ask us to carry out these tasks on your behalf, should you require technical support. Students can request their details are updated, amended or deleted, by contacting your school.

Focus on Sound Ltd

On expiry of the subscription we will retain archived data on our systems for up to 2 years in case your school wants to renew the subscription. We may need to retain certain additional information about the service provision to satisfy our contractual, legal, accounting, or reporting obligations, however this will not contain student data and is usually archived and kept for 5 years after termination of the service contract.