

# **School Data & Information Security Overview**

Helping schools to securely manage their data

# School data & Information Security Overview

This document is maintained by Wonde's information security compliance team, and reflects the current information security and management procedures, controls, policies and practices across the company. It aims to help clarify Wonde's position in the data processing chain and answer frequently asked questions around how Schools, Wonde and third party edtech applications ("**Apps**") interact.

## Company overview

<b>Name</b>	Wonde Limited
<b>Company Number</b>	08645640
<b>ICO Registration Number</b>	ZA118834
<b>Head Office</b>	Furlong House, 2 Kings Court, Newmarket, CB8 7SG
<b>Website</b>	<a href="http://www.wonde.com">www.wonde.com</a>
<b>Security Accreditation</b>	ISO27001 Cyber Essentials Plus
<b>Government Supplier</b>	Crown Commercial Service Framework Supplier Supplier to the DfE in England
<b>Head of Information Security</b>	Andrew Dool
<b>Data Protection Manager</b>	David King
<b>Data Protection Email</b>	data@wonde.com

## What is Wonde?

Wonde has been designed with data protection and security in mind and is used by 25,000+ schools and by 400+ Apps.

A school needs full confidence in the security and reliability of their technology. Wonde's innovative platform has been designed and built to integrate seamlessly with a school Management Information System ("**MIS**").

Wonde's intuitive data management system provides schools with a single portal from which they have full visibility and control over the data they share with Apps, whilst maintaining the highest levels of data security and integrity.

Wonde is used by the large majority of Apps to connect and synchronise their platform with the important data within a schools MIS. These include Apps such as The Fischer Family Trust, Discovery Education, Times Tables Rock Stars, GL Education, Renaissance Learning. The Department for Education in England also uses Wonde for their attendance acquisition project.

*"We love working with Wonde. Both our customers and TTRockStars are treated really well. The team at Wonde have excellent technical support and ticketing systems in place which are managed really well."* Bruno Reddy – Founder Times Tables Rockstars

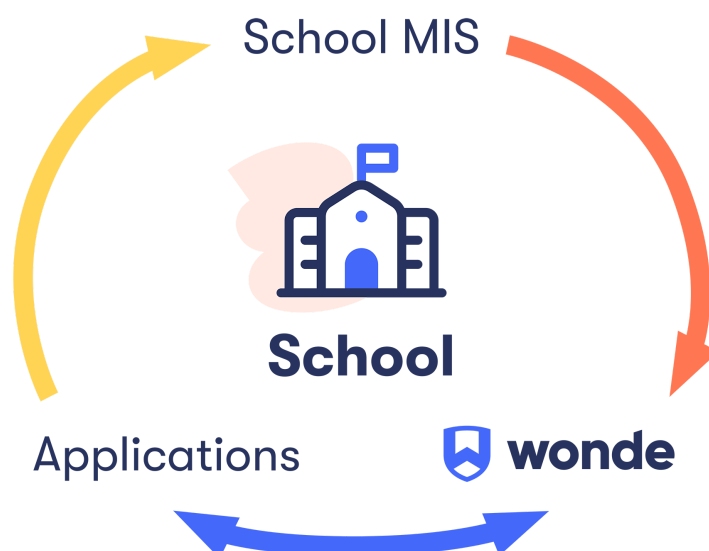
### **Is Wonde recommended by the Government?**

Wonde is on the Government's G-Cloud framework and is a framework supplier for the Crown Commercial Service.

Wonde is used by schools, Apps, Local Authorities and by Government departments/organisations.

## How does Wonde work?

Wonde is a secure platform that sits between your schools MIS and the Apps that your schools use.



Upon connecting to your MIS, Wonde lets Apps synchronise their systems with the required information all via a simple approval based process with the school in full control of what data is shared with each App.

Wonde is designed to help schools be the masters of their data. All access to data requested by an App must be approved by the school before Wonde can connect and begin synchronising that data. Schools have the power to review, revoke and add data sets to an App, keeping the school in full control of its data at all times **(See Appendix 1 for more information)**.

## What data does Wonde process?

The types of data Wonde processes is dependent on what the school wishes to share with the App, controlled within the Wonde school portal. Upon connecting to a schools MIS Wonde will only extract the data that is requested by Apps used by the school AND ONLY data that is approved by the school.

Throughout the installation of Wonde at a school, Wonde will request access to a range of data sets that are required for the majority of Apps. Wonde cannot extract the data until an App connection has been approved by the school. The school has full control of this process inside the Wonde school portal.

### **How often does Wonde extract data from the MIS?**

Wonde extracts data from a school's MIS on a regular basis to ensure Apps engaged by the school have accurate and up to date data with which to provide their service to the school.

*For example;*

At 09.45am a parent contacts the school office to say they have changed their mobile phone number. The school immediately inputs the new mobile phone number into the MIS. Later that day at 14.30pm the school sends an SMS text message to the same parent. The school would expect the new mobile phone number to be available within the SMS text messaging App used by the school, Wonde's frequent data extractions make this possible.

By default, data updates which overwrite existing data in an App, occur multiple times a day, therefore there may be a delay between updating the information in the MIS and reflecting that information within an App. If required, Wonde can adjust the data extraction/update frequency to meet any custom school or App requirements.

### **Where is the data stored?**

Wonde uses Amazon Web Services (AWS). These storage facilities are based in Ireland which keeps all school data within the European Economic Area (EEA).

AWS is a data storage supplier that offers the highest level of security to ensure it is compliant with the UK GDPR and the Data Protection Act 2018. Many government departments now use AWS including HMRC, the DVLA and Ministry of Justice.

## **Will any data be transferred outside of the EEA?**

Wonde complies with all requirements of Data Protection Legislation including international transfers. Schools may seek to engage with Apps outside of the EEA, in which case, a circumstance may arise where the school authorises the transfer. Wonde is able to facilitate this on the basis that schools have completed their own due diligence and with the schools approval. .

Wonde also seeks to engage our suppliers and software providers to retain any data within the EEA. However, in circumstances where that is not possible or in the absence of any adequacy decision, Wonde ensures that it has safeguards in place in accordance with Data Protection Legislation, which include contractual terms and Standard Contractual Clauses.

## **Who has access to the school's data?**

Wonde employees are not permitted to view school data by default. In situations where it is necessary to access school data on behalf of the school, such as when the team at Wonde are assisting the school to investigate a specific support case, only an approved Wonde technical team member can access. Wonde employees are bound by their contractual obligations regarding confidentiality and data protection. All staff are DBS checked and follow strict ISO27001 protocols. Wonde has an internal data protection team who regularly review this process and enforce its data protection policies.

## **Can schools control what data is available to Apps**

Yes – Wonde's platform gives schools full visibility and control over the data they share. The Apps define the data sets required for their App and the School can limit this according to the agreements they enter into with each App.

These data sets can be defined down to a granular level (i.e. first name, last name). Schools can view the data sets an App is requesting access to from within the Wonde school portal.

The data sets requested by an App are in two different categories:

Required – The bare minimum of data an App requires for a school to use the App.

Optional – Additional data that may add enhanced functionality/features to the App.

On the rare occasion a school wishes to amend the Required data they can do so by contacting Wonde on [support@wonde.com](mailto:support@wonde.com) Wonde will liaise with the App to ensure this doesn't impact the schools use of the App.

Schools are able to control the Optional data requested by Apps from within the Wonde school portal via a simple toggle on/off system.

Within the Wonde school portal schools can revoke access to an App with immediate effect. Once revoked, the App will receive no further data from the schools MIS via Wonde. Please note that revoking access does not force the App to delete the school data previously provided to them, if this is required the school should make a request directly with the App.

### **How long does Wonde retain data for?**

Wonde will retain School data for the duration for which our services are being utilised by the school. Please see the [Data Processing Agreement](#) for further information on data retention.

Wonde only maintains the latest data from within a school's MIS. If a school removes all Apps from the Wonde school portal, and providing the school doesn't reconnect other Apps, Wonde will delete data as per our data retention schedule (available on request).

### **What software will be installed?**

Wonde's software is cloud based and with the schools permission, connects to the schools MIS. There are various methods to connect Wonde depending on the MIS used by each school. This will be confirmed from Wonde's first communication with a school.

### **Do Wonde undertake DBS checks?**

All Wonde employees undergo a Disclosure and Barring Service (DBS) check carried out by a certified third party.

## **Does Wonde hold any independent security accreditation?**

Wonde has the following security accreditation:

ISO27001

Cyber Essential Plus

Data security is at the core of Wonde's business and is led by the internal data compliance and security team, ensuring our internal processes meet the highest standards.

## **Which data protection laws apply to Wonde?**

In the UK, there are two key relevant data protection laws ("**Data Protection Laws**") including the UK General Data Protection Regulation ("**UK GDPR**") and the Data Protection Act 2018 ("**DPA 2018**") which sets out key principles and regimes to govern the protection of personal data.

The school has the primary responsibility as the data controller to determine the basis upon which it collects the school data and the purpose for which it may be used.

Wonde's [privacy notice](#) sets out the lawful basis upon which it processes any personal data in the provision of our services.

Wonde ensures it enters into all appropriate contracts with the relevant parties to facilitate its services and to ensure compliance with the data protection legislation, including the UK GDPR and the DPA 2018.

## **Is Wonde a data processor or a data controller?**

Wonde is the data processor of the school.

The school is the data controller.

For the purposes of providing our services through our technology, to both schools and Apps, Wonde acts as a direct processor of the school and accordingly enters into a data processing agreement directly with a school. This is in place to protect each school's data and the agreement formally sets out the instructions that Wonde must operate under, to process the



school data for the school's benefit and to facilitate the transfer of school data to the Apps.

Wonde also enters into commercial and data protection agreements with Apps and MIS providers.

### **Does the school have a data processing agreement with Wonde?**

Yes, to use Wonde's services a school approves the Wonde Data Processing Agreement (DPA) which can be found here:

<https://www.wonde.com/wp-content/uploads/Data-Processing-Agreement-Wonde.pdf>

### **Can a school request Wonde removes all data stored for their school?**

Yes, schools can request Wonde to remove all school data related to their school. Wonde will also inform any App that they will no longer be able to access the school's data through Wonde.

### **Can schools request that an individual's data is not extracted from their MIS?**

Yes, Wonde can stop the data of any individual who does not want Wonde to store or pass on their data to an App. Schools can manage this process within the Wonde School Portal.

### **How does Wonde secure school data?**

- All data shared between the school and Wonde is encrypted during transit and at rest. Wonde uses the AWS RDS encryption service and its own SSL certificates, an analysis can be found [here](#).
- Access to school data is protected by active access rights management, adopting the principle of least privilege, secure passwords and IP limitations.
- Two factor authentication is required for all accounts that have access to school data or administrative functionality.
- Monthly penetration testing is completed on Wonde's systems, an internal

review process is completed to act on any feedback provided.

- Wonde operates a suite of physical security measures within our offices.
- All devices used by staff are fully encrypted and utilise the most up to date anti-virus software and hard drive encryptions to protect them.
- Wonde performs regular disaster recovery and business continuity testing

### **Does Wonde have in place a data breach policy?**

Yes – Wonde has in place internal and external procedures and policies to deal with any data breaches or incidents.

## Appendix 1: How schools install and connect to an App

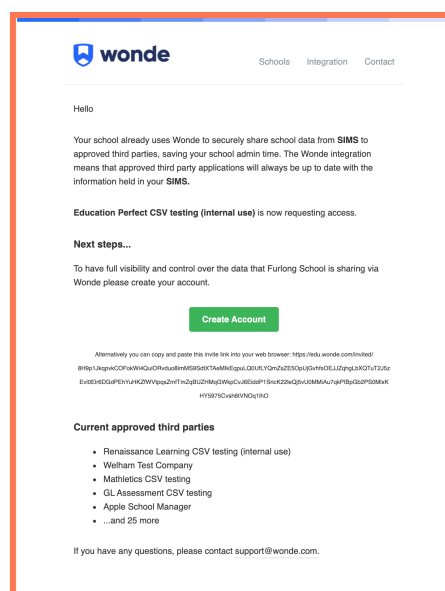
This document explains the process a school first follows when they choose to configure an integration between one of the third party applications (App) they use and their Management Information System (MIS) through Wonde.

The process consists of two key stages of firstly approving the App, followed by configuring the connection between their MIS and Wonde.

Once the school's first App has requested to connect to the school, Wonde will verify this contact at the school via a phone call. An email is then sent from Wonde with a secure link for the school to create their admin account.

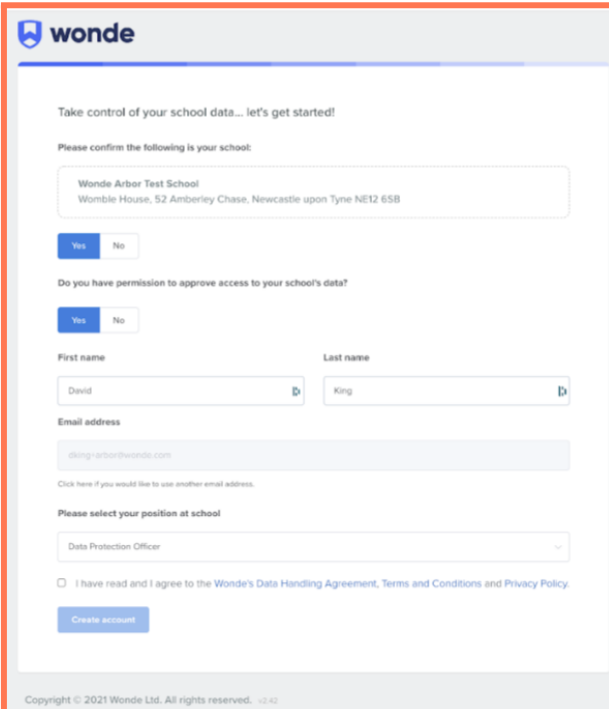
### 1) Creating your school's Wonde account

Upon receiving the initial email and clicking through to begin creating their account, the first step is to confirm that the user has the authority to approve access to school data stored in the Management Information System (MIS). If the user doesn't have permission, an additional screen asks for the correct contact details to be added. A new email invite is then sent to the nominated person.



Once the user who has the authority to approve access to school data receives the email invitation (as shown above), they click through to begin their school's

Wonde account creation, filling out the following fields.

A screenshot of the Wonde account creation form. The form is titled 'Take control of your school data... let's get started!'. It asks the user to confirm the school name and address, which are pre-filled as 'Wonde Arbor Test School' and 'Womble House, 52 Amberley Chase, Newcastle upon Tyne NE12 6SB'. There are 'Yes' and 'No' buttons for confirmation. Next, it asks if the user has permission to approve access to the school's data, also with 'Yes' and 'No' buttons. Then, it asks for the first and last names, with 'David' and 'King' entered. Below that is an email address field with 'd.king@arborwonde.com' entered. A link is provided to click if the user wants to use another email address. Then, it asks the user to select their position at school, with 'Data Protection Officer' selected. A checkbox is present for 'I have read and I agree to the Wonde's Data Handling Agreement, Terms and Conditions and Privacy Policy'. At the bottom is a 'Create account' button. The footer contains the copyright notice 'Copyright © 2021 Wonde Ltd. All rights reserved. 11/42'.

Upon clicking 'Create Account', their account becomes active and they will be able to review and approve any requests from Apps to connect to their school data.

## 2) Reviewing a request from an App

Each time a School Wonde Admin User (Admin) logs into their Wonde portal, they arrive at the Dashboard which displays any new apps that have requested to connect and are therefore 'Pending Approval':

- The user can now click on the App to review the data the App is requesting be shared with it. This is the same data that the school would previously be sending to it via CSV or manually inputting.
- The user can now see the list of each data set (permissions) that the app has requested to be shared with it in order for it to work most effectively.
- These permissions are either 'Required' or 'Optional'.
  - Required - The basic data that the App requires in order to function.
  - Optional - The school has the ability to toggle these on/off, potentially having an impact on the functionality of the App. Optional permissions are often used

for additional modules that an App has which not all schools use and hence the school can toggle them on/off as needed.

- If a group of permissions (e.g. Photo) is selected, such permissions are shown on a granular level to highlight the individual fields..

Dashboard > SCR Manager > Permissions

Approve access Decline access

### Permissions

These are the permissions that the application is requesting to access the school's data.

Student 8 optional >

Groups, Classes & Subjects >

Timetable >

Employee 1 optional v

Permission	Optional	Enabled
Employee read	—	New
↳ Employees upi read	—	New
↳ Employees title read	—	New
↳ Employees initials read	—	New
↳ Employees surname read	<input checked="" type="checkbox"/>	New

Once the user has reviewed the permissions requested by the app, they can choose to either approve or decline the App's access to the requested school data.

Confirm Action

By clicking approve access to SCR Manager you agree to [Wonde's Data Processing Agreement](#), [Licence Terms](#), [Privacy Notice](#), and [SCR Manager's Agreement](#).

Cancel Approve Access

Warning: Declining Access

Are you sure you want to decline access to SCR Manager?

Cancel Decline access

### 3) Approving or Declining an App

If the Approve access option is selected, an email approval receipt is sent to all Admins and to the App. This email highlights the name of the App and their permissions, who approved them, their position and the date/time approved.

*If in the future the App makes a change to their permissions or requests additional data be shared with them in order perhaps for a new feature to work, the school will be prompted to review and approve any changes before the App can access the new permissions.*

*If the Decline access option is chosen, the App will receive an email highlighting this, the reason the school declined and therefore the data will not be shared with them. Should the school change their mind at a later stage and wish to approve the connection, the App will have to go through the request process once again.*

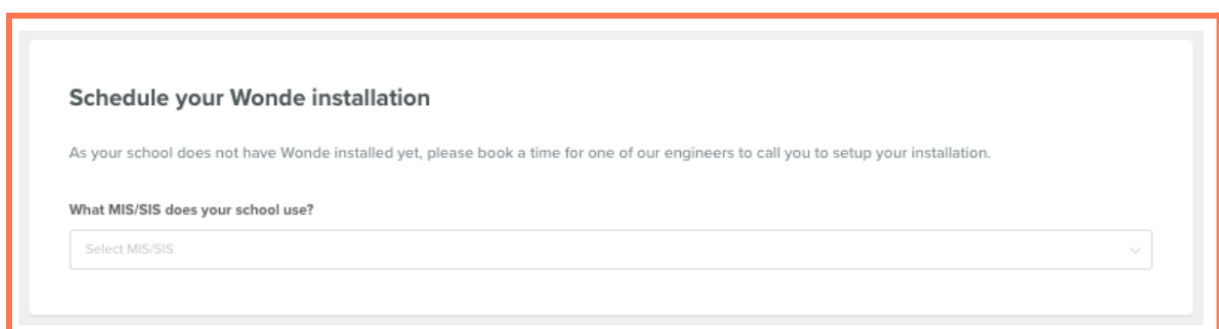
*If the App is approved by the school, the school will then further engage with Wonde to configure the integration of Wonde with the school's Management Information System. Once this is complete, Wonde will be able to sync the permissions approved by the school and provide them to the App.*

#### **4) Integrating with the Management Information System**

*Once an App has been granted access ('Approved access' above), the Admin is taken through to the steps of configuring the connection of their MIS to Wonde. This is a one time process and only needs to be completed after the first App has been approved by the school.*

*This can be done by following the simple installation guide or with the help of Wonde's Integrations Team.*

*a) From the dropdown, select the type of MIS used by your school:*



**Schedule your Wonde installation**

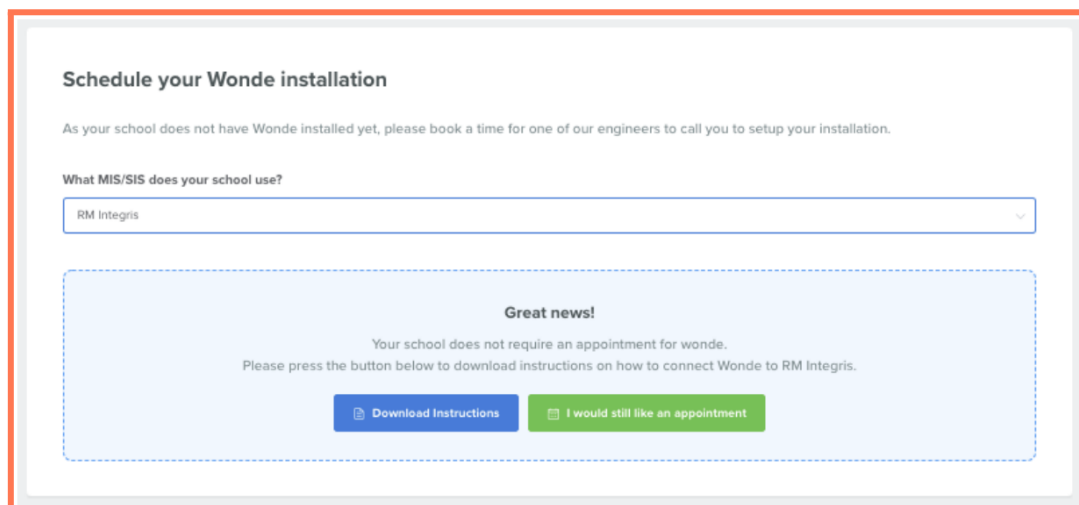
As your school does not have Wonde installed yet, please book a time for one of our engineers to call you to setup your installation.

What MIS/SIS does your school use?

Select MIS/SIS

*b) Depending on the MIS selected, the following step will either provide the*

user with a guide to complete the integration or arrange an appointment.



**Schedule your Wonde installation**

As your school does not have Wonde installed yet, please book a time for one of our engineers to call you to setup your installation.

What MIS/SIS does your school use?

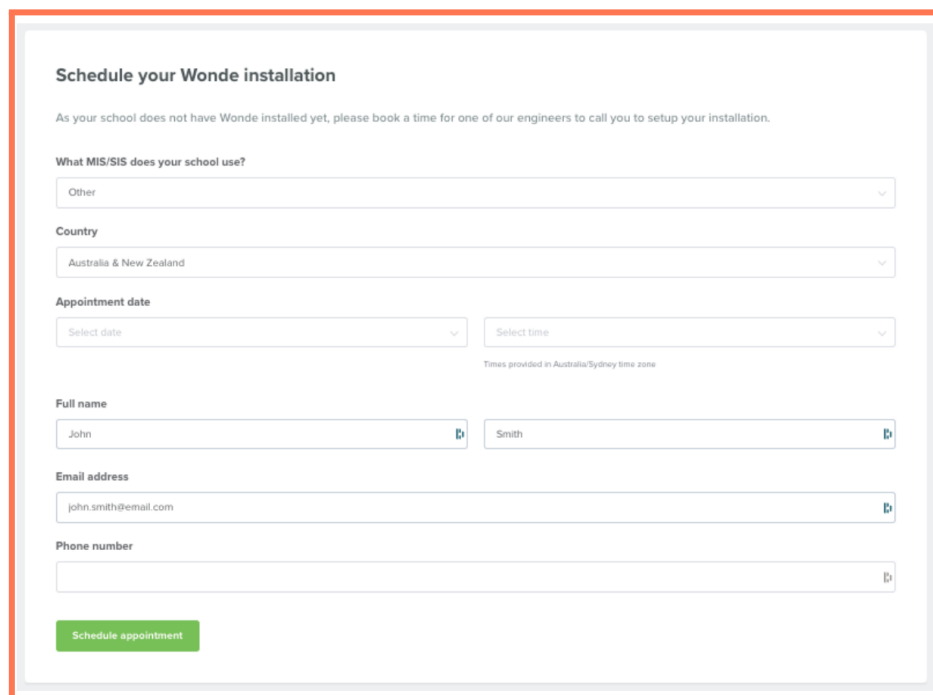
RM Integraris

**Great news!**

Your school does not require an appointment for wonde.  
Please press the button below to download instructions on how to connect Wonde to RM Integraris.

[Download Instructions](#) [I would still like an appointment](#)

c) If the user selects the option to schedule an appointment, they simply choose a date/time whereby a Wonde representative will make contact to assist them with the process.



**Schedule your Wonde installation**

As your school does not have Wonde installed yet, please book a time for one of our engineers to call you to setup your installation.

What MIS/SIS does your school use?

Other

Country

Australia & New Zealand

Appointment date

Select date Select time

Times provided in Australia/Sydney time zone

Full name

John Smith

Email address

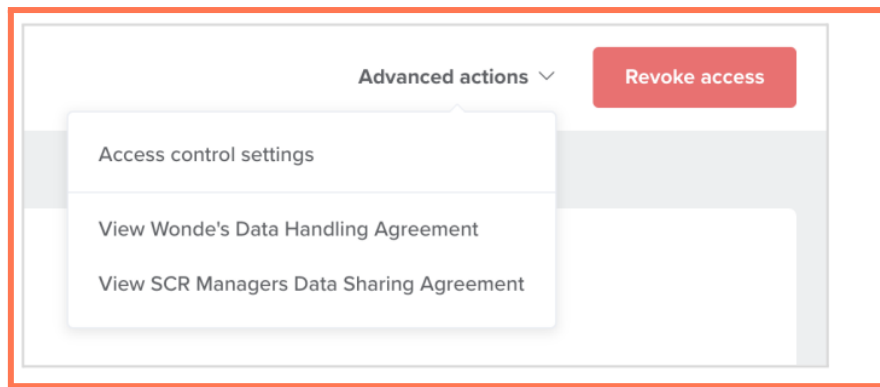
john.smith@email.com

Phone number

[Schedule appointment](#)

## 5) Access control

Wonde also provides a school with the ability to control exactly which individuals' data is shared with the App. The 'Access control settings' tab is available in the top right of the page when viewing an app's details.



*There are three options available:*

- *First option allows all users associated with the permissions to be accessed.*
- *Second option is when the school wishes to exclude certain users – The data associated with any individuals selected will not be passed onto the App.*
- *Third option is when the school wishes to only include a small number of users – Only the data associated with the individuals selected will be passed onto the app. All other users will be excluded.*

	Name	User type	Registration	Year	Access
<input type="checkbox"/>	Alisa Abbas	Employee			Included
<input type="checkbox"/>	Latif Abbas	Student	PM	N2	Included

## Questions?

*If you have any questions or would like further information please contact:*

*Email: [support@wonde.com](mailto:support@wonde.com)*



## **Appendix 2: Wonde Data Protection and Information Security Key Information**

Here you'll find more information about Wonde, including general information, the purpose of the Wonde application and how Wonde manages data subject rights.

### **Section 1**

#### **General details about Wonde**

1. What is Wonde's registered name, as listed on Companies House?

Wonde Limited

2. What type of organisation is Wonde?

Private limited company

3. What is Wonde's registration number?

8645640

4. What is Wonde's registered address?

Furlong House, 2 Kings Court, Newmarket, Suffolk, England, CB8 7SG

5. What is Wonde's main activity?

Software development

6. What is Wonde's website address?

<https://www.wonde.com/>

7. What are the addresses of Wonde's other offices?

Level 14, 5 Martin Place, Sydney, 2000 NSW, Australia  
Tremough Innovation Centre, Tremough Campus, Penryn, Cornwall TR10 9TA

8. In which year was Wonde incorporated?

2013

9. What is Wonde's VAT number?

GB 230643047

## Section 2

### Contact details

These are the ways that customers can Wonde.

1. General enquiries email address

hello@wonde.com

2. Customer support email address

support@wonde.com

3. Telephone numbers

01638 438094

4. Hours when customer support is available

Monday to Friday 8.30am to 5.30pm

5. What is the name of the individual that is responsible for data protection?

David King

6. What is their job title?

Data protection manager

7. What is the email address for data security enquiries?

data@wonde.com

8. What is the telephone number for data security enquiries?

01638 438094

## Section 3

### Accountability

1. Data processing agreement

This can be found on our website, and is located [here](#)

2. School contract

An example of our school licence terms and conditions can be provided on request.

3. A data map or similar

This can be found on our School Data Protection and Information Security document, found [here](#).

4. A privacy notice or policy for customers

[Link to Privacy Notice document](#)

5. A data protection policy

We have an internal Data Protection Policy, which can be provided on request.

6. An information security policy, or similar

Held as part of our ISO 27001 certified Information Security Management System (ISMS), can be provided on request.

7. A working from home data security policy for staff

As part of our ISO 27001 certified ISMS, we have a remote working policy which can be provided on request.

8. A bring your own device policy for staff

N/A

9. A breach response process

Our data breach responsibilities are documented in our Data Processing Agreement. Additionally we have an internal data incident response policy which is reviewed annually.

10. A documented password policy that guides all users of the external service

User passwords are marked based on how easy a password is to guess, no explicit policy is provided to users.

11. A business continuity plan as it refers to the apps in question

Our business continuity plan is held as part of our ISO 27001 certified ISMS and can be provided if required.

12. Do the privacy notice and data protection policy reflect the UK GDPR and Data Protection Act 2018?

Yes ▾

13. How regularly are our policies reviewed?

Annually

14. What is our Information Commissioner's Office registration number?

ZA118834

15. What is the contact email for any policy queries from customers?

[support@wonde.com](mailto:support@wonde.com) or <https://www.wonde.com/contact/>

16. In our SLA, what is Wonde's guaranteed uptime?

99.5%

17. How regularly do staff receive data protection training?

On induction and then 6 monthly, applies to all staff

18. How regularly do staff receive cyber security training?

On induction and then 6 monthly, applies to all staff

## Section 4

### Accreditations

1. Cyber Essentials

14/12/2021

2. Cyber Essentials Plus

19/02/2022

3. Does your Cyber Essentials accreditation cover the whole organisation?

Yes, the whole organisation

4. ISO27001

Yes

5. SOC 2 Type II Certification

No

6. PCI DSS

Not applicable for Wonde

## Section 5

### About your software application

1. Application product name

Wonde API

2. Give an overview of Wonde's app and describe what it is designed to do

Wonde's innovative platform has been designed and built to integrate seamlessly with a school MIS, ensuring your data is securely maintained, managed and accessible. A single, simple to use portal enables you to access and control all of your apps.

3. Was the app built to be used by schools?

Yes ▾

4. How is this app designed to support schools, what impact is it designed to have?  
For example, to improve attendance, to raise standards in maths

Improvements in the administration of software and the accuracy of the data it holds

5. Is the app sold directly to consumers, for example, parents or only to schools?

Only schools can buy the app ▾

6. Does the app access personal data?

Yes ▾

7. Does the app access this data from the MIS?

Yes ▾

8. Which special category data does the app access?

This is defined by the third party app accessing the data, and approved, where required, by the school.

9. Does consent need to be sought from the parent, child or other user to use the app?

No ▾

Wonde acts as a data processor for schools and so does not need to seek the consent of data subjects. As the data controller, the school will need to make sure they have a lawful basis in place to authorise any processing of the data.

10. Does the app collect any additional personal data in addition to what is accessed from the MIS? If yes, what data does it collect?

No ▾

Wonde accesses the data as requested by the third party app and is approved by the school prior to any processing.

11. Which groups of people in school mainly use this app? Such as, parents, teachers, pupils, support staff

Support staff and senior leaders

12. If pupils use the app, which age group is it intended for?

They don't use the app supplied by Wonde.

13. Which groups of data subject's data is collected by your software?

We do not define which data subjects' data is accessed, this is set by the app we are connecting to the MIS and approved by the school.

14. How many data subjects' data is processed by the app?

Wonde will add this based on the specific school's numbers.

15. What data categories does the software access?

We do not define the data categories, these are requested by the app we are connecting to the MIS and approved by the school.

16. Add why and how each data category is accessed by the software?

This is defined by the third party app and is approved by the school

17. Is any data collected that isn't required for the functionality of the app?

No

18. Why is data collected that isn't required by the app?

Upon installation, Wonde will request access to a range of data sets that are required for the majority of apps. Once approved, Wonde will have access to these data sets, but cannot extract the data until a live and approved connection with an app is established. The school has full control of this process inside the Wonde school portal. Only data that is requested by a school's approved apps, and subsequently approved by the school, is extracted.

19. Does this app meet the ICO's Children's Code 2021?

This app doesn't need to meet the code ▾

20. Is the app developed by your organisation or by an external company?

We develop the app ourselves ▾

21. In which country is the app developed?

Wonde was developed in the United Kingdom. Some post development support is handled by our team based in Manilla, who have no access to customers' personal data.

22. Is test data used in software development?

Yes ▾



## Section 6

### Data protection

1. Does anyone with access to customer data undergo employment screening, for example criminal history checks (DBS)? If yes, which groups?

Yes ▾

Access to customer data is highly restricted. However, all employees undergo employment screening and are DBS checked on joining Wonde.

2. In which country does Wonde store customer data?

Within the EEA ▾

3. List all cloud services that are provided by a third party and used by Wonde;

Wonde has a list of sub-processors located at <https://www.wonde.com/security/subprocessors/>

4. Do any of your third party suppliers and subcontractors have access to customers' data?

Yes ▾

5. Are links to third party privacy notices available to customers? If yes, how do they access these?

No ▾

6. Is there an incident response plan for third party suppliers?

Yes ▾

7. How long does Wonde retain customer data for?

More information on our retention period can be found in our Data Processing Agreement.

8. Is customer data retained for research or testing purposes?

No ▾

9. Is any customer data used for advertising or targeting purposes, either directly or via third parties?

No ▾

10. Are all of Wonde service's web servers secured with digital certificates signed by a reputable trusted authority?

Yes ▾

Yes, AWS (Amazon Web Services) computing environments are continuously audited, with certifications from accreditation bodies across the world, including ISO 27001, FedRAMP, DoD CSM, and PCI DSS. Wonde requires that all API calls are authenticated with a secure API token and transmitted on a secure SSL connection.

Additionally, backups are all managed and stored in AWS and are encrypted at rest. The system maintains an automated 17 day back-up policy, where Wonde can restore the database to any point in time within that time window.

11. If customer data traverses public or unprotected networks, is it protected by strong encryption?

Yes ▾

12. Is customer data encrypted at rest?

Yes ▾

13. Are backups encrypted?

Yes ▾

14. Are portable devices, such as laptops and mobile phones, encrypted?

Yes ▾

15. Does this app allow users from one school to find, access or discover users from another school, or organisation, including when logging in or signing up?

No ▾

16. Do you have in place security measures to prevent brute force type password guessing attacks? For example, account lockouts or captcha forms  
Yes ▾
17. Is there an approval process before accounts are created for staff? Please describe the process  
Yes ▾
18. Do all user and administrator accounts have a unique username and password?  
Yes ▾
19. Is there a process for removing staff accounts when they are no longer needed?  
Yes ▾
20. Are staff account privileges role based?  
Yes ▾

### Data subjects rights

1. The right of rectification

How can data subjects request for their data to be corrected?

Wonde acts as a processor and will use the most up-to-date data provided by the school. As such, the school is the controller and responsible for ensuring the data provided to Wonde is accurate.

2. The right to erasure

How can data subjects request for their data to be deleted?

Removing data at a school level will cause this data to be removed for Wonde. Wonde will refer individuals to the data controller to complete this process.

3. The right to restrict processing

How can data subjects request that their data isn't processed?

Wonde provides schools the ability to block specific individual data sets on the wonde portal.

4. The right to be informed

How do you inform data subjects that their data is being shared?

Schools should inform data subjects that data is shared with third party apps.

5. The right of access

How do data subjects request a copy of their data?

Data subjects should contact the school in the first instance as the school remains the data controller. If a data subject contacts Wonde directly, where we are acting as a processor, we will contact the school to inform them of the request.

Individual data is identifiable and all records can be viewed within admin portals.

6. The right to data portability

Can data be extracted to be used elsewhere?

Data can be extracted in the form of a CSV file to be used elsewhere.

7. The right to object

How do data subjects object to their data being processed in the app?

At the request of the school, or the data subject via the school, Wonde can block an individual's data from being processed.

## Section 7

### Network security

This section explores how secure your network is and the software it runs

1. How often does Wonde conduct vulnerability scans on your network?

More frequently than annually ▾

2. Does Wonde have firewalls at the boundaries between your organisation's internal networks, laptops, desktops, servers and the internet?

Yes ▾

3. Are default passwords always changed on devices such as internet routers or hardware firewall devices?

Yes ▾

4. Are all high-risk or critical security updates for operating systems and firmware installed within 14 days of release?

Yes ▾

## Section 8

### Risk Management

1. What possible risks could this processing lead to for the data subjects?

See below ▾

Accidental or unlawful destruction, unauthorised disclosure and unauthorised access

2. Does Wonde have a risk assessment strategy that is established and in practice?

Yes ▾

3. Does Wonde maintain an information security asset register?

Yes ▾

4. Is the asset register checked at least annually for accuracy?

Yes ▾

5. Is risk assessment conducted at least annually?

Yes ▾

6. Does Wonde conduct regular reviews of the physical security environment of the business premises and associated physical security risks?

Yes ▾