

Company Name/Address - ESQ Creations. 103 Severn Road. Weston-Super-Mare. Somerset U.K. BS23 1DS Data Protection Officer - Mr K. RINEY (GDPR Cert)

The conditions of this policy pertain to the programmed internet websites at URL addresses:

www.greeninschools.com and www.schoolsquestusa.com **Descriptions Below:**

1. Both websites have the sole function to aid schools with students of all ages in the field of Domestic (Home) Energy Science.
2. Both websites are entirely in the public internet domain and form no link to any school internal **INTRANET** facility. (*Where personal/private information may be stored*)
3. Both websites store **ONLY** the names of teachers/students and formed classes
4. **Neither website** has the capacity to store **ANY** other personal/private information such as Home Addresses, Email Addresses, Telephone Numbers, Bank Accounts, Dates of Birth, Links to social media such as Facebook/Twitter (*and all others*), on any person of any age or gender.
5. When registered with the ESQ system, each school is given a secure **LOGIN and PASSWORD** which should never be divulged to persons not working at the school.
6. When enrolled (*By the class teacher*), to complete the course, each enrolled student will be given a **CLASS PASSWORD NUMBER** when they are ready to enter their findings into the program. Students can use this number to enter the program either in the classroom, or in their homes via the internet.

GDPR Dangers of Unauthorized Access, and Resolutions.

Scenario 1: – A school accidentally or otherwise, allows its main **ESQ LOGIN AND PASSWORD** to become known in the public domain.

- A. This would allow person(s) unknown, to access each formed class and the **names only** of the students within such classes. **NO** other personal details of any kind are available as they are not requested or entered at time of class enrolment. Such private details being held on the school INTERNAL INTRANET SYSTEM which is in **NO WAY OR FORM** connected to the ESQ system.

POSSIBLE DAMAGES INCURRED IN SUCH A SECURITY BREACH:

- B. The only foreseeable damage would be that the perpetrators could access each CLASS PASSWORD NUMBER, which would allow them access from the LOGIN PAGE of the public internet based www.greeninschools.com or www.schoolsquestusa.com websites. Such illegal access would restrict any perpetrator(s) to only accessing any teacher formed class and the **NAME ONLY** of any student enrolled in such a class. From such a selection of a name, they can now only access the program to enter false details to create a false Home Energy Report which is held in the teachers own filing records. No such Home Energy Reports carry any address details as to which home, or where they are located in the U.K.
- C. All such unauthorized penetrations into the ESQ system would be quickly discovered when either students or teachers discover such false reports have been created. The resulting damage is minimal, as teachers can simply re-form the (*Damaged*) class(s) and distribute a new CLASS PASSWORD NUMBER to each student.
- D. **Scenario 2:** If a student accidentally or otherwise divulges the individual class access number, the damage done is less again as it will only allow access to one set of class names, which when used once, such names automatically (*Electronically*) disappear from the class list.

Terminology relative to the *“THE ENERGY SAVING QUEST FOR SCHOOLS”*

Controller: - *“Person or entity determining the purpose and means of processing personal data”*

ESQ Relativity: Because “ESQ Creations” designed and administer the above-named product, which is subsequently licensed on a yearly basis to schools, the company “**ESQ Creations**” is deemed the controller. However, the controller’s power to control all elements is limited without the responsible actions of processors (teachers) to facilitate the system properly.

Data Breach: *“Any accidental or unlawful destruction loss, alteration or unauthorised disclosure or access.”*

ESQ Relativity: Please see above scenario’s in **“GDPR Dangers of Unauthorized Access, and Resolutions.”**

E.U.-U.S. Privacy Shield: *“A standard making the transfer of data to the U.S. lawful”*

ESQ Relativity: The two programmed websites (*www.greeninschools.com* designed for UK schools and www.schoolsquestusa.com for the U.S.A.) are entirely separate entities and share NO PERSONAL DETAILS in any form.

Personal Data: *“Information relating to an identifiable individual”*

ESQ Relativity: The question of being “identifiable” being relative to a name and a school class the name is in, only, (*The only personal data recorded in the two programmed websites*). The possibilities of such information being used for identity theft or any other misdemeanour are extremely remote, due to the repetition of names generally in society. On the internet, certain large/international internet based social platforms, encourage and facilitate the exposure of extensive personal details of those who sign up to such platforms. and make easier targets for such criminal intention.

Processing: *“Any operation performed upon personal data”*

ESQ Relativity: Relating to a name in a school class, the name is only required to identify which student created their own “Home Energy Report”, in order that the correct report is assigned to the correct student. No other “operation” is performed with this simple recorded data.

Processor: *“Person (or entity) that processes data on behalf of a controller”*

ESQ Relativity: If teachers inform their students of the possible dangers they may encounter during their “Home Investigations”, and a list of such dangers accompanies each students “Questionnaire” taken home for parental guidance, (*Documented comprehensively in websites downloads*), they will be deemed to have acted professionally.

Sensitive Personal Data: Involving many subjects such as race, religion etc.

ESQ Relativity: In consideration of the fact that ONLY A NAME (*Whether a student or teacher*) is entered into the system, and NO OTHER SENSITIVE PERSONAL DATA is entered, we fail to see how any abuse or acts of deliberate criminality can be construed from a name only.

Third Country *“A jurisdiction outside of the UK”*

ESQ Relativity: None - UK schools only can apply to be registered.