

# Atom IT Services Privacy Policy

## Office 365 Account Provisioning for Schools

Last Updated: April 2025

### 1. Introduction

Atom IT (“we,” “us,” or “our”) provides schools with a service to automate the creation of Office 365 accounts by securely accessing data from the school’s Management Information System (MIS). This Privacy Policy outlines how we process personal data in compliance with the \*\*EU General Data Protection Regulation (GDPR) 2016/679\*\*.

### 2. Data Controller & Processor

Data Controller:

The school (educational institution) is the data controller, determining the purposes and legal basis for processing student/staff data.

Data Processor:

Atom IT acts as a data processor, handling data solely under the school’s documented instructions.

GDPR Reference: Articles 4(7), 4(8), and 28.

### 3. Data We Collect

We collect the following minimal data from the school’s MIS system:

Data Category	Data
Identifiers	First name, Last name
Academic Information	Year group, Registration group
Unique Identifier	MIS identifier (student/staff ID)

No sensitive/special category data (e.g., health, ethnicity) is processed

### 4. Purpose of Processing

Data is used **exclusively** for:

1. Automatically generating Office 365 email addresses (e.g., `first.last@school.org` ).
2. Creating and managing secure passwords for accounts.
3. Syncing account details with Microsoft Office 365.

## 5. Legal Basis for Processing

The school, as the controller, ensures compliance with GDPR lawful bases, typically:

- Public Task (Article 6(1)(e)): Processing necessary for the school's official functions.
- Legitimate Interests (Article 6(1)(f)): For IT administration and security.

Atom IT processes data only under the school's instructions.

GDPR Reference: Articles 6, 28(3), and 29.

## 6. Data Sharing & Third Parties

- Microsoft Office 365: Data is shared to provision accounts. Microsoft acts as a sub-processor and complies with GDPR. Data is stored in EU-based Microsoft data centres.
- Atom IT Employees: Access is restricted to named employees requiring it for service delivery.
- No third-party marketing or unrelated sharing occurs.

GDPR Reference: Articles 28(2) and 32.

## 7. Data Security

We implement GDPR-mandated safeguards, including:

- Encryption of data in transit and at rest.
- Strict access controls (multi-factor authentication, role-based permissions).
- Regular security audits and employee training.
- Compliance with Article 32 (security of processing).

## 8. Data Retention

Data is retained only as long as necessary to:

- Provide the service (e.g., while the user is enrolled/employed at the school).
- Fulfill legal obligations.

Upon school request or service termination, data is securely deleted.

GDPR Reference: Articles 5(1)(e) and 17.

## 9. Data Subject Rights

Individuals (students/parents/staff) may exercise GDPR rights via the school, including:

1. Access (Article 15)
2. Rectification (Article 16)

3. Erasure (Article 17)
4. Restriction (Article 18)
5. Portability (Article 20)

Atom IT will assist the school in fulfilling these requests.

## 10. International Data Transfers

All data is stored and processed within the EU. Microsoft's EU data centres ensure no transfers outside the EU occur without GDPR-compliant safeguards.

## 11. Contact Information

Atom IT's Data Protection Officer (DPO):

Email: [dpo@atomit.co.uk](mailto:dpo@atomit.co.uk)

School's Data Controller:

[Insert school's name, address, email, and phone number]

## 12. Policy Updates

Updates will be communicated to the school in advance. Continued use of the service implies acceptance.

**This policy complies with GDPR Articles 12–14 (transparency requirements) and is reviewed annually.**