

COMPLIANCE WITH THE GENERAL DATA PROTECTION REGULATION

Although we technically process data on behalf of schools, we are a data controller in our own right and as such we are registered with the Information Commissioner's Office (Cool Milk at School Ltd - Registration Code Z6142600) and we are subject to, and we comply with, the relevant obligations imposed on all data controllers.

What action are we taking, or have we taken, to prepare for the GDPR?

Our internal project team and IT department have reviewed the regulation and we have taken all necessary steps to ensure that we are compliant. Our directors review progress and approve all relevant actions at our monthly Board Meeting.

What technical and organisational security measures do we have in place to protect personal data? How secure are our systems?

Cool Milk is committed to its customers' security and privacy needs. Customer data is stored on our secure servers at our offices in Lincoln, United Kingdom. Our building is protected by an electronic access control system. Our network is protected by an up-to-date firewall and comprehensive anti-virus and anti-malware software. We employ third-party security experts to perform annual external penetration tests on our network to ensure that we remain protected against malicious attack. We have active network monitoring processes in place to detect any unusual activity.

What policies and procedures do we have in place to protect personal data?

All Cool Milk employees sign strict confidentiality agreements to ensure that they take data security seriously. PCs are locked to prevent download of data to external devices. We never share personal data with any third parties other than with government agencies for audit purposes. We have documented processes in respect of Subject Access Requests and notification Of Data Breaches.

What data do we hold?

We hold names and dates of birth of children registered by the school, and we hold names and contact details of parents that choose to register children themselves, independently of the school. We may also collect, store and use information about your computer and about your visits to and use of our

websites (including your IP address, geographical location, browser type, referral source,

Working in partnership with



Cool Milk at School Ltd | Cool Milk House | Kingsley Park | Kingsley Road | Lincoln | LN6 3TA

TELEPHONE 0333 400 1199 FAX 0843 659 6840

WEB www.coolmilk.com

Company Registration No 3603430 England

Registered Office Address
Tindles LLP | Scotswood House
Teesdale South | Stockton-on-Tees
Cleveland | TS17 6SB

length of visit and number of page views), and information relating to any purchases you make of our goods or services.

COOL MILK'S COMMITMENT TO SCHOOLS

Please rest assured that we take our data protection responsibilities very seriously. Your data, and that of thousands of other schools across the UK, is safe with us.

1. Cool Milk shall comply with any written instructions with respect to processing by the School.
2. The people who process the data (Cool Milk personnel) are committed to confidentiality.
3. Cool Milk will not engage another processor without prior written authorisation from the school, and if we do so, the processor will also be bound by the same data protection conditions as described in this Annex and accompanying letter.
4. Cool Milk will help the school comply with requirements regarding the data rights of individuals (e.g. to access, delete or rectify data), secure processing, the reporting and communication of data breaches, and the conducting of impact assessments where relevant.
5. Cool Milk will delete or return personal data to the school at the end of the provision of services, subject to the conditions laid out in the table below.
6. Cool Milk will make information available to the school to demonstrate compliance with our obligations.



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Langworth | Lincolnshire | LN3 5BH

SCHEDULE OF PROCESSING, PERSONAL DATA AND DATA SUBJECTS

Description	Details
Subject matter of the processing	Cool Milk supplies milk and associated administration services to thousands of schools and childcare establishments throughout Great Britain. We process data relating to schools, parents and children in order to administer customers' accounts and to supply milk to registered children at the correct locations and times. We do not use the data for any other purpose.
Duration of the processing	We process the data from the date on which the child and parent's details are registered in respect of the school milk scheme, and we retain data for audit purposes for two academic years after the end of the academic year in which milk supply ceases.
Nature and purposes of the processing	We collect the names and contact details of schools and parents and the names and dates of birth of their children via our online and paper-based registration processes. This data is stored in our structured database and used to calculate and generate orders, invoices and payments in respect of school milk.
Type of Personal Data	We hold Personal Data for parents (name, address, telephone number, email address) and children (name, address, date of birth, school, class). We do not hold Sensitive Personal Data.
Categories of Data Subject	We hold Personal Data for parents and children that are registered to receive milk at the School.
Plan for return and destruction of the data once the processing is complete	We retain data for audit purposes for two academic years after the end of the academic year in which milk supply ceases, after which time the child data is deleted and parent data is anonymised i.e. the parents' name is changed to "Unknown" and their address, phone number and email address are deleted.

Signed:

Name: Chris Hogg

Position: Deputy Managing Director

Company: Cool Milk at School Ltd

ICO Reg Code: Z614260



Date: 16 March 2018

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