



HolidayActivities

DPIA Support Document



Data & information security overview

This document is maintained by Holiday Activities Information Security Compliance team, and reflects the current information security and management procedures, controls, policies and practices across the company. It aims to clarify Holiday Activities' position in the data processing chain and answer frequently asked questions.

Company overview

Controller Name	Evouchers Limited
ICO Registration Number	ZB504479
Head of Information Security	Gemma Stannard
Data Protection Manager	David King
Data Protection email	data@evouchers.com

Data Protection and Information Security key information

Here you'll find further information about Holiday Activities, including general information, the purpose of the application and how we manage data subject rights.

The Holiday Activities Platform is produced by Evouchers Limited (trading as Holiday Activities), more information can be found at <https://www.holidayactivities.com/>.

Section 1

General details about Evouchers

1. What is Evouchers registered name, as listed on Companies House?

Evouchers Limited

2. What type of organisation is Evouchers?

Private limited company

3. What is Evouchers registration number?

14159254

4. What is Evouchers registered address?

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

5. What is Evouchers main activity?

Software development

6. What is Evouchers website address?

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

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

N/A

8. In which year was Evouchers incorporated?

2022

Section 2

Contact details

These are the ways that customers can contact Holiday Activities.

1. General enquiries email address

support@holidayactivities.com

2. Customer support email address

support@holidayactivities.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?

support@holidayactivities.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 legal documentation is available at <https://www.holidayactivities.com/legal-documents/>

3. A data map or similar

This can be provided on request.

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

No

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 at minimum

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

ZA118834

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

support@holidayactivities.com

16. In our SLA, what is Holiday Activities guaranteed uptime?

99.5%

17. How regularly do staff receive data protection training?

On induction and then annually, applies to all staff

18. How regularly do staff receive cyber security training?

On induction and then annually, applies to all staff

Section 4

Accreditations

1. Cyber Essentials

14/12/2023

2. Cyber Essentials Plus

31/01/2024

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

Section 5

About your software application

1. Application product name

Holiday Activities

2. Give an overview of Holiday Activities app and describe what it is designed to do

Holiday Activities is the dedicated platform built to run and report on your local authority HAF programme. Whether you are a local authority, parent/recipient, school or activity provider we aim to make the process of distributing and using HAF vouchers as simple as possible.

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 provision of Holiday Activity Fund vouchers to students

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

Parents and other consumers 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?

We request access to SEN information to support our platform functionality. Additional special category data may be collected directly from parents when booking an activity.

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

No ▾

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?

Yes ▾

When booking onto an activity, a parent may provide supporting information such as details on allergies.

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

Support staff

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

They don't use this app.

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

Students and Contacts

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

Holiday Activities will request information on all students and their contacts.

15. What data categories does the software access?

Personal and optional special category

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

This information is used to provide platform functionality (such as filtering) and to send out Holiday Activities Fund vouchers

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?

This is not applicable, we only collect data necessary for our functionality.

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?

Holiday Activities is developed and maintained in the United Kingdom.

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 the business.

2. In which country does Holiday Activities store customer data?

Within the EEA ▾

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

Holiday Activities has a list of sub-processors on our website

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

No ▾

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 Holiday Activities 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 Holiday Activities 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. Holiday Activities 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 Holiday Activities 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?

Data can be rectified within the Holiday Activities platform by parents, or by contacting support@holidayactivities.com. We will contact the school directly where this data was originally obtained from a school integration.

2. The right to erasure

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

Holiday Activities can delete data if required. Contact will be made with the school and/or local authority prior to doing so.

3. The right to restrict processing

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

Holiday Activities provides schools the ability to block specific individual data sets on the application.

4. The right to be informed

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

We will provide all users with an accessible privacy policy and data agreements where applicable.

5. The right of access

How do data subjects request a copy of their data?

If a data subject contacts Holiday Activities directly, we will contact the school to confirm data can be provided. Requests can be made to support@holidayactivities.com.

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, Holiday Activities 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 Holiday Activities conduct vulnerability scans on your network?

More frequently than annually ▾

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

Yes ▾

3. Does Holiday Activities 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 Holiday Activities conduct regular reviews of the physical security environment of the business premises and associated physical security risks?

Yes ▾