



Evouchers

DPIA support document

Evouchers – Support Document



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

Company overview

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

Questions

Section 1

General details about your business

1. What is your organisation's registered name? As listed on Companies House or similar

Evouchers Limited

2. What type of organisation are you? Eg Ltd, PLC, Charity

Private limited company

3. What is your organisation's registration number?

14159254

4. What is your organisation's registered address?

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

5. What is the main activity of your business?

Software development

6. What is the main website address?

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

7. If you have other offices, what are their addresses?

N/A

8. In which year were you incorporated?

2022

Section 2

Contact details

These are the ways that customers can contact you.

1. General enquiries email address

hello@evouchers.com

2. Customer support email address

hello@evouchers.com

3. Telephone numbers

4. Hours when customer support is available

Monday to Friday 8.30am to 5.30pm

5. Out of hours contact details - in case of emergencies

6. Customer support knowledge base web link or similar

7. What is the name of the individual or the company you use that is responsible for data protection?

8. What is their job title?

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

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

Section 3

Accountability

If your organisation has the following documentation and policies, please supply links to them, the physical document or an explanation or link to the document in which the policy can be found.

1. Data processing agreement

2. School contract

request.

3. A service level agreement (SLA) for schools

n/a

4. A data map or similar

n/a

5. A privacy notice or policy for customers

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

6. A data protection policy

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

7. An information security policy, or similar

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

8. 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.

9. A bring your own device policy for staff

N/A

10. 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.

11. 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.

12. 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.

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

Yes ▾

14. How regularly are your policies reviewed? For example, annually

Annually

15. What is your Information Commissioner's Office registration number?

ZA118834

16. If you operate in Ireland, what is your Data Protection Commission registration number?

N/A

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

support@evouchers.com

18. In your SLA, what is the guaranteed uptime of your app?

99.5%

19. How regularly do staff receive data protection training?

On induction and then annually, applies to all staff

20. How regularly do staff receive cyber security training?

On induction and then annually, applies to all staff

Section 4

Accreditations

Which of the following information management or security accreditations does your organisation hold? Please add the date achieved, working towards if this is in progress or not relevant if this isn't appropriate for your organisation.

1. Cyber Essentials

14/12/2022

2. Cyber Essentials Plus

31/01/2023

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

Yes, the whole organisation

4. ISO27001

Yes 19/10/2026

5. SOC 2 Type II Certification

No

6. PCI DSS

Not applicable for Wonde

7. Do you hold any other relevant accreditations?

Section 5

About your software application

Use this section to tell us about your software application and its intended impact on schools. If you have more than one app with Wonde, please complete this section for each one.

1. Application product name

Evouchers

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

An effortless online voucher solution for schools and local authorities in the UK to procure, assign and distribute grocery vouchers.

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

Provides a solution to purchase, assign and distribute vouchers

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

Parents and other consumers can buy the app ▾

Evouchers can be used by Schools, Local Authorities, Housing Associations and other organisations. A voucher recipient App is also available.

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?

Evouchers can collect data relating to pupil premium and free school meal eligibility.

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

No ▾

Evouchers acts as a data processor for schools and does not need to seek the consent of data subjects to provide them with vouchers. When users create an account, Evouchers acts as a Data Controller and documents its lawful basis within it's Privacy Notice.

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 ▾

Evouchers will collect the IP address of users when they log into the Evouchers app

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

Support staff, senior leaders and parents

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

They don't use the app supplied by Evouchers.

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

Student Wonde ID
Student MIS ID
Student Forname
Student Surname
Student UPN
Student FSM
Student Pupil Premium
Student Year group
Contact Wonde ID

Contact MIS ID
Contact Forname
Contact Surname
Contact Email
Contact Phone
Contact Relationship
Contact Parental Responsibility
Contact Lives with Pupil
Contact Court Order

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

This is defined by the organisation upon providing Evouchers with data

15. What data categories does the software access?

Personal Data

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

This data is provided by the school via Wonde Integration or direct CSV upload

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?

N/A

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?

Evouchers was developed in the United Kingdom.

22. Is test data used in software development?

Yes ▾

Section 6

Data protection

This section is about how your organisation handles and shares customer data.

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 upon joining Evouchers

2. In which country do you store customer data? Please explain if you choose other

Within the EEA ▾

3. List all cloud services that are provided by a third party and used by your organisation, or provide a link to where these are listed

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 your 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 do you retain customer data for?

More information on our retention period can be found [here](#).

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 your 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

Please explain how data subjects exercise rights over their personal data. For example, do they contact you directly or is this managed by the school?

1. The right of rectification

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

Evouchers acts as a processor for data provided by the school 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 is accurate.

Evouchers is the Data Controller for user account information, a data subject can email support@evouchers.com for data to be rectified

2. The right to erasure

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

Where a data subject makes a request to delete data Evouchers will refer them to the school as the Data Controller

3. The right to restrict processing

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

Evouchers provides schools the ability to block specific individual data sets on the Evoucher app.

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 Evouchers. Users are provided with a Privacy Notice upon account creation.

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 where the school is the data controller. If a data subject contacts Evouchers directly, where we are acting as a processor, we will contact the school to inform them of the request.

Where Evouchers operates as a data controller, data subjects can email support@evouchers.com for assistance.

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 do you conduct vulnerability scans on your network?

More frequently than annually ▾

2. Do you 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

This section explores possible risks to the data and how your organisation manages risk. If there is documentation to support your responses, please supply or link to this.

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 your organisation have a risk assessment strategy that is established and in practice?

Yes ▾

3. Do you 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. Do you conduct regular reviews of the physical security environment of the business premises and associated physical security risks?

Yes ▾