**SCHEDULE OF PROCESSING ACTIVITIES**

Company Name: Nautilus Education

Contact Officer: David Rushby

Name of Processing Activity: Staff Access and Educational Observation Management

**Subject matter of the processing**

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| * **Purpose**: To enable secure user access and facilitate professional observations within schools * **Data Processed**: Staff names and work email addresses only * **Activities Included**: Collection, storage, authentication, role-based access, audit logging, and reporting * **Exclusions**: No pupil data, employment records, or sensitive personal information is processed |

**Duration of the processing**

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| *1 Year plan, subject to renewal* |

**Nature and purposes of the processing**

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| *Nautilus Education processes limited personal data—specifically staff names and work email addresses—for the purpose of enabling secure access to its cloud-based school leadership platform. The processing includes:*   * ***Collection*** *of staff identifiers via user input* * ***Recording and structuring*** *within secure databases hosted on AWS* * ***Storage and retrieval*** *to support login, role-based access, and audit trails* * ***Consultation and use*** *by authorised users to perform educational observations* * ***Adaptation or alteration*** *of user details (e.g. name or email updates)* * ***Transmission*** *across secure connections for remote access* * ***Restriction, erasure, or destruction*** *in line with retention policies or user requests*   *No pupil data or sensitive personal information is collected, stored, or processed.*  ***Purposes of the Processing***  *The processing is carried out for the following defined purposes:*   * ***User authentication and access control*** * ***Facilitation of professional observations and reporting*** * ***Audit logging and system monitoring*** * ***Support and administration of platform functionality*** * ***Compliance with data protection obligations under UK GDPR*** * ***Service continuity and user experience optimisation***   *All processing is strictly limited to operational use within educational settings and does not extend to employment processing, recruitment, statutory reporting, or marketing.* |

**Type of Personal Data**

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| **Staff Full Name** | - | Used to identify users within the platform and associate observations with individual staff members. |
| **Work Email Address** | - | Used for account creation, authentication, role-based access, and system notifications |

**Categories of Data Subject**

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| *Staff* |

**Retention of Personal Data**

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| ***Retention Period****: Personal data is retained for the duration of the user’s active engagement with the platform.*  ***Account Closure or Inactivity****: Upon account deactivation, termination of employment, or prolonged inactivity (typically 12 months), personal data is securely deleted or anonymised in accordance with internal data lifecycle policies.*  ***Backups****: Backup archives containing personal data are retained for up to 30 days for recovery and continuity purposes, after which they are automatically purged.* |