

★ SECURITY & DATA RESIDENCY COMPLIANCE DRAFT CHARTER

Boarding School Software Pty Ltd

26112025

1. Our Security Commitment

Boarding School Software is engineered with a core mandate: to protect student data, safeguard privacy, respect regional legislation, and give schools high confidence in the integrity and safety of their information. We continuously monitor global standards and evolve our platform accordingly.

2. Data Residency Assurance

We guarantee that school data remains within the region selected during onboarding. We support distinct, independent hosting in:

- **Australia & New Zealand** – aligned with the Australian Privacy Principles (APPs) and New Zealand Privacy Act 2020
- **European Union** – aligned with the General Data Protection Regulation (GDPR)
- **United Kingdom** – aligned with UK-GDPR and the Data Protection Act
- **United States** – aligned with the California Consumer Privacy Act (CCPA) and COPPA where applicable
- **Canada** – aligned with PIPEDA (Personal Information Protection and Electronic Documents Act) and provincial equivalents
- **Asia-Pacific** – aligned with PDPA (Singapore), PDP Act (Malaysia), APPI (Japan), and comparable regional frameworks
- **Africa** – aligned with POPIA (South Africa), NDPR (Nigeria), and other local privacy acts
- **Middle East** – aligned with ADGM Data Protection Regulations, DIFC DP Law, and emerging regional privacy standards

Your data is **never transferred outside your chosen region** unless your school explicitly requests it.

3. Cloud Infrastructure & AWS Standards

All customer data is hosted securely within **Amazon Web Services (AWS)** — a global leader in commercial cloud security.

Our AWS environment includes:

✓ **Dedicated Regional Deployment**

Each region is isolated with its own AWS services, ensuring no cross-jurisdiction co-location.

✓ **Multi-AZ Redundancy**

Ensures availability during infrastructure or environmental disruptions.

✓ **Encrypted Databases (AES-256)**

Full encryption at rest and in transit.

✓ **Encrypted S3 Storage (AES-256)**

All stored files follow enforced encryption standards.

✓ **AWS WAF & Shield Protections**

Protection against bots, malicious requests, and common web attack vectors.

✓ **Hardened EC2 Servers**

Using IAM with least-privilege access, private VPC networks, and strict role boundaries.

✓ **Secure Lifecycle Backup Practice**

Nightly snapshots and backups age out under an automated, secure **lifecycle practice**, not retained beyond necessity.

These standards reflect the requirements provided to our AWS engineers during setup.

4. Access, Identity & Authentication

We enforce strong authentication and controlled access:

- **Two-Factor Authentication** for all users
 - **Role-based access control** for staff, medical, admin and pastoral teams
 - **No mandatory SSO or data-sharing across external systems**
 - Staff and students may optionally use credentials matching their school accounts
 - Access is monitored, logged and protected under secure AWS identity policies
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5. Data Protection, Privacy & Support Access

We comply with the privacy expectations and legal frameworks active in the region your school selects.

- Personal data is never shared with third parties **in accordance with our Privacy Policy**
- TLS 1.2+ encryption for all data in transit
- Secure handling of logs and metadata
- School-initiated data exports are available at any time

Support Access (fact-checked & compliant)

When your school contacts our Helpdesk, authorised technical personnel *may* briefly access system-level data **only for the purpose of diagnosing functionality** — not for viewing student records, personal files, or behavioural history.

All access is logged and strictly limited to resolving the issue at hand, in line with industry privacy expectations.

6. “Right to Be Forgotten”

On service termination:

- We provide your school with an aggregated export of stored data (on request)
 - Your active data is securely deleted
 - Backups then expire automatically under the secure lifecycle **practice** noted above
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7. Independent Operation

Boarding School Software operates independently from school day-systems, reducing security exposure and ensuring operational continuity.

API integration is available where required but remains optional and controlled.

8. Ongoing Compliance & Improvement

We regularly review:

- AWS security bulletins
- Infrastructure updates
- Data protection regulatory changes
- Boarding-sector operational trends

- Client feedback

We maintain clear communication with schools regarding improvements, changes, or new security features.

9. Contact & Technical Review

Schools may request a region-specific technical review covering:

- AWS configuration
- Residency selections
- Access controls
- Deletion lifecycle
- Authentication policy

We also offer access to a demonstration environment for evaluation.