

Multi-factor Authentication and Password Reset Privacy Notice

Introduction

As a Data Controller, North West Regional College (“the College”) recognises and respects the importance of your privacy and is committed to treating your personal information responsibly and in compliance with all relevant data protection legislation.

The College will process all personal data in compliance with the data protection legislation for the purpose of providing you with a service and to meet our statutory obligations.

North West Regional College is a Data Controller registered with the Information Commissioner’s Office (ICO) and is responsible under the data protection legislation for the personal data that you submit to us.

The College’s registration reference number with the ICO is **Z4821243**.

The Data Protection Officer for the College is Lois McKean (dpo@nwrc.ac.uk).

Purpose of the Processing

NWRC is expanding measures to help protect NWRC systems and data held within its systems. These include multi-factor authentication (MFA) (i.e. requiring system users to verify their identity using additional factors alongside the current use of usernames and passwords) and more user controlled access to password resets.

For these purposes, we will be asking all staff and students to complete a registration process for MFA and automatic password re-set service (SSPR). Users can also choose to use an authenticator app (*Microsoft Authenticator*) as an authentication factor, by downloading the app to their smartphone and entering a code provided by the app when attempting external access to College resources.

Why are we doing this?

NWRC has ongoing legal duties to ensure the integrity of its systems and protect personal data and other information held within its systems. Cyber attacks on organisations’ systems are becoming increasingly common – even within our HE and FE sector. These attacks have a very significant impact on organisations and individuals. A cyber security incident could result in loss of personal information of College staff, students and third parties, lock users out of NWRC systems and resources, and disable key operations. A worst-case scenario could involve the college being unable to access and use core systems for a significant period. Successful cyber attacks very often start through use of a compromised staff or student email i.e. where the attacker is able to log into the system using the account details of an authorised user. MFA and password reset are intended to make that much more difficult.

MFA is already generally used to manage public access to services such as banking, and therefore widely accepted as an expected level of protection in many sectors. MFA is becoming a standard or expected security measure, along with regular password-reset.

In this context the college has carefully considered the risks and benefits of introducing the MFA and user password reset processes. We consider that it is necessary to use MFA and SSPR to ensure appropriate protection for college systems.

Lawful Basis

The College is permitted to process personal data where there is a lawful basis to do so. Under the UK GDPR our lawful basis for processing is under:

Article 6.1 (e) – Public Interest

- processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller.

Categories of Personal Data

The authentication process must by definition use some information which is personal to you or personally accessible only by you. As set out below, the personal data you provide for these purposes will be kept secure and used minimally:

- Name
- College Email Address
- Mobile Number

We encourage you to use the *authentication app* for MFA, as this reduces the amount of personal contact information you need to input each time while still providing the direct personal verification required for security purposes.

Personal data collected for this purpose will not be used beyond the purpose of MFA.

How is MFA personal information held?

The details you provide will always be kept securely within the Microsoft 365 system. The information will only be used for authentication. The information will only be accessible to you (via your college login to Microsoft 365) and to a small number of IT Services privileged administrators.

If you have read the information above but still have questions or concerns about providing your personal data for these purposes, please contact the NWRC Data Protection Officer, Lois McKean, at dpo@nwrc.ac.uk

Full details on Data Protection and your rights are available on our website www.nwrc.ac.uk/data-protection.