LAINNOV

LEGAL NOTICE

Class Attendance Privacy Notice

Who holds student data, what is collected, how long it is kept, and how to ask for access or deletion.

help.lainnov.com/attendance-privacy

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The latest version of this guide, with search, is at **help.lainnov.com/attendance-privacy**. Questions: support@lainnov.com.

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Class Attendance Privacy Notice

This notice explains how personal data is used when a school, faculty or university takes lecture attendance with LAINNOV Class Attendance. It is written for registrars, data-protection officers, lecturers and students.

LAINNOV provides the software. The institution that opens Class Attendance (the faculty account) decides who is enrolled, who may teach, and how attendance is used. That institution is the **data controller**. LAINNOV is the **data processor**: we store and process the data only to run the service the institution asked for.

THIS NOTICE IS ABOUT CLASS ATTENDANCE

It covers lecture attendance in LAINNOV Scan: the student register, lecturer portal, rotating classroom code, location flags, warnings and official registers. It does not replace the institution's own student privacy notice, or LAINNOV's platform Privacy Policy. The Class Attendance Terms sit alongside this notice.

Who is responsible

PARTY	ROLE	WHAT THEY DECIDE
The institution (the LAINNOV account that owns the faculty)	Data controller	To take attendance; what is imported onto the register; who is a lecturer or department administrator; expected attendance; whether location is checked; whether warnings are sent; how long records are kept for academic purposes.
LAINNOV	Data processor	To host the service, keep it secure, send mail and texts only when the institution (or a lecturer it authorised) asks, and delete or export data when the controller instructs us.
Lecturers and department administrators	The institution's authorised users	They see only what their role allows. They are not LAINNOV account holders.
Students	Data subjects	They sign in on their own phone. They do not see other students' records.

Where the institution is in Ghana, the Data Protection Act, 2012 (Act 843) applies. Where it is elsewhere, the institution must still have a lawful basis under the law of that country. LAINNOV processes personal data on the institution's documented instructions, which these product settings constitute.

What is collected

Only what is needed to take lecture attendance, tell the student they signed in, and let the institution run its academic process.

Students

- **Identity on the register.** Name, index number, programme, level. Phone and email if the institution or a lecturer adds them. A photograph if the class form asks for one — used so a lecturer can recognise the person in the room, not for automated facial recognition.
- **Enrolment.** Which classes the student is on, when they were added or dropped, and (if dropped) the reason the lecturer typed for the audit trail.
- **Attendance marks.** For each counted lecture: present, late, incomplete, excused or absent; the time of sign-in and, if used, sign-out or a presence check.
- **Device link.** A code stored on the phone's browser that ties that phone to the index number for every class in this faculty. One phone cannot stay linked to two students. Changing phones needs the lecturer's approval, which is recorded.
- **Location, only if the lecturer turned the check on.** Approximate coordinates when the student signs in. Students away from the classroom, or who do not share a location, are *flagged*. They are still signed in. Location is never used to block attendance.
- **Flags and disputes.** Another phone tried this index number; this phone tried another student; signed in in the last seconds of the code; a presence check without a sign-in. Move requests and the lecturer's decision.
- **Warnings.** Whether a warning was sent, when, and by which channel (email or text). The wording the lecturer chose.
- **Official registers.** A dated snapshot the lecturer issues (who had what mark that day), a verification code, and a fingerprint so a paper copy can be checked later.

A student is not asked to create an LAINNOV account. Signing in is scanning a code (or typing six digits) and, the first time, typing an index number.

Lecturers and department administrators

- Name, work email, optional staff ID and phone, department, and whether they may send attendance texts.
- A password they set themselves (stored as a one-way hash, never in plain text).
- Sign-in sessions (device description, when last seen) so they can be signed out everywhere.
- Actions they take — opening a lecture, marking a student, sending warnings, changing Setup, unlinking a phone — in the class audit trail, with their name and the time.

The faculty account

- The faculty name shown on the lecturer sign-in page, the sign-in link code, departments, programmes, and which LAINNOV user owns the faculty.
- Whether Custom Email is subscribed and a sending domain is verified — required for invites, password codes and student warning emails.

Technical data

To keep the service up and to investigate abuse: IP address, browser type, time of the request, and error logs. These are not used to profile students and are not shown on the lecturer or faculty screens as a student record.

What we do not do

- We do not sell student or lecturer data.
- We do not use attendance records for advertising, credit scoring or unrelated analytics products.
- We do not share a class list with another institution, or with another faculty on LAINNOV.
- We do not run automated facial recognition or biometric matching on student photographs.
- We do not block a student from signing in because of location. A flag is a note for the lecturer, not a refusal.
- Students cannot see other students. A lecturer sees only the classes they are assigned. A department administrator sees only their department.
- Class attendance email does not leave through a shared platform sender. Invites, resets and warnings go from the institution’s verified sending domain, or they are not sent.

Why it is processed (lawful basis)

LAINNOV processes this data because the institution instructed us to provide lecture attendance. The institution must have its own lawful basis. Typical bases for a school or university are:

- **Public task or legal obligation** — keeping an academic attendance record the institution is required or expected to keep.
- **Contract** — the student's enrolment terms, where those terms include attendance.
- **Legitimate interests** — running lectures fairly, discouraging proxy sign-in, and warning a student who is falling behind, balanced against the student's rights.
- **Consent** — only where the institution relies on it (for example an optional photograph). Signing in to a lecture the student is enrolled on is not treated by LAINNOV as marketing consent.

Location is processed only when the course lead turns the check on, and only to flag distance from the classroom the lecturer set. Device linking exists so that one phone cannot sign in as two people, and so a stolen or shared index number can be seen.

Who can see it

WHO	WHAT THEY CAN SEE
The student	That they signed in (or were late, or that sign-in is closed). Not other students, not the class list, not analytics.
Course lead and assistants	The class roster, marks, flags, warnings and the audit trail for that class.
Department administrator	Classes, lecturers and students in that department, and its analytics.
Faculty (the LAINNOV account)	The whole faculty: register, classes, lecturers, analytics, and Custom Email settings.
A person with a register verification link	Only the snapshot that was issued — the figures as they stood that day — to check a paper copy.
LAINNOV support	Only when the faculty writes to us about a fault, and only what is needed to fix it. Support does not browse class lists as a matter of course.

Texts and emails are sent to the address or number on the student's record, using the institution's Custom Email domain and, for SMS, the institution's text credits and a lecturer who is allowed to send texts.

Who LAINNOV uses to run the service

LAINNOV hosts Class Attendance on its own servers (currently in the infrastructure that serves *services.lainnov.com*). Mail leaves through the sending domain the institution verified. Texts leave through the institution's SMS wallet on LAINNOV. We do not name every supplier here because those details change; a current list of sub-processors is available to an institution on written request to support@lainnov.com. We require anyone who handles personal data for us to keep it confidential and to use it only on our instructions.

Where data is stored

The service is operated from Ghana. Data may be stored or backed up in the country where our hosting sits. If that is outside the institution’s country, LAINNOV uses encryption in transit (HTTPS) and access controls, and will enter the extra contracts an institution’s law requires when the institution asks.

How long it is kept

- **While the class is active** — the register, lectures, marks, flags, warnings and audit trail stay so the institution can run the course and issue a register.
- **After a student is taken off a class** — marks already taken stay on file (they come back if the student is enrolled again). The person is no longer on the live roster.
- **After a class is deleted** — it leaves every dashboard. Attendance already taken stays on file and is not opened from the class list. The faculty can ask us in writing to erase it.
- **Official registers** — kept so a verification code continues to work, until the faculty asks us to withdraw them.
- **Lecturer sessions** — until they expire (14 days if “Keep me signed in” was on; otherwise the browser session) or someone signs them out.
- **Technical logs** — a short operational period, then they roll off, unless they are needed for a security investigation.

The institution chooses how long it must keep academic records under its own rules (for example an examinations office). LAINNOV does not delete a live faculty’s attendance on a calendar we invent. When the LAINNOV account is closed, we delete or return the faculty’s Class Attendance data within 90 days, unless the law requires us to keep a copy.

Students under 18

Class Attendance can be used by a secondary school as well as a university. If any student is under 18, the institution must have the authority its law requires (parent or guardian, or a provision of education law) before it imports that student or takes their attendance. LAINNOV does not seek parental consent itself; we process the record because the institution put the student on the register.

Rights

A student or lecturer can ask the **institution** first — it is the controller and it can correct a name, drop a class, unlink a phone or stop warnings. The institution can do most of this in the product without writing to LAINNOV.

They may also write to LAINNOV at support@lainnov.com. We will:

- confirm whether we process their data and, if so, what it is used for;
- point them to the faculty that holds the class, because we cannot change a mark or drop a student without that faculty's instruction;
- help the faculty export or correct a record, or erase what the law allows, within 30 days of a verified request (or the period the applicable law sets);
- say if we cannot do what was asked, and why (for example a mark the faculty must keep for an examination).

In Ghana, a complaint may also be made to the Data Protection Commission. In another country, to that country's supervisory authority. We ask that the institution is contacted first so a simple correction is not delayed.

How it is protected

- Access to a faculty is limited by role (faculty, department, course lead, assistant, viewer).
- Lecturers sign in with their own email and password. Passwords are hashed. “Keep me signed in” is off-by-default on a shared computer if they leave the box unticked.
- Student sign-in uses a code that changes every few seconds. A code is not a password and is not reused after it rotates.
- The device link is a secret stored in that phone’s browser, not the index number in the clear as a public login.
- Connections use HTTPS. Administrative access to production systems is limited to LAINNOV staff who need it to run the service.
- An audit trail records who opened a lecture, marked a student, sent a warning, changed Setup or unlinked a phone.

No system is free of risk. The institution must use strong passwords, sign lecturers out of lab computers, and approve a phone move only when the student is in front of them.

Cookies and local storage on the student’s phone

The sign-in page stores a device key in the browser so the next lecture does not ask for the index number again, and may keep a short queue if the phone was offline when they scanned. These are essential to the service. We do not place advertising cookies on the student page. Lecturers may have a session cookie or local storage for “Keep me signed in”. See also the platform Cookie Policy.

Changes to this notice

If we change how Class Attendance uses personal data in a way that affects students or lecturers, we will update this page and the date at the top, and we will tell faculty owners by email or in the product. The current version is always at help.lainnov.com/attendance-privacy.

How to contact us

Privacy and data-protection requests: support@lainnov.com. Write from the email on the faculty account if you are the institution, and say which faculty, class and (if it helps) index number. Students should include the faculty name and their index number.

This notice should be read with the Class Attendance Terms and the Class Attendance user guide.