



Document Management

Data Protection & Privacy Policy

Revision

2.1

Revision History

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Approval

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1 About this document

This Data Protection and Privacy policy will help you understand how we collect, use and protect your personal information. If you have any queries about this document or how we process your personal information please contact our Data Protection Officer

Data Protection Officer – Contact Details

by email: bernie@sis4it.com

by post to Data Protection Officer, Select Information Systems Ltd., Suite 10, Centre for Advanced Industry, North Shields, NE29 6DE.

By telephone: 0191 2960872

2 Who we are

The organisation responsible for processing your personal information is Select Information Systems Ltd (SiS) (Company Number: 2978193) a software development company.

SiS act as a 'data controller' for our Client's data and as a 'data processor' if we are managing our client's customer data, which we do in accordance with the Data Protection Act 1998 and the General Data Protection Regulation 2018 (GDPR)).

Our registration number with the Information Commissioner's Office is Z9239240

<https://ico.org.uk/ESDWebPages/Entry/Z9239240>.

3 Data Protection Terms

Data is information stored electronically, on a computer, or in certain paper-based filing systems.

Data subjects for the purpose of this policy includes all living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.

Personal data means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.

Data controllers are the people or organisations which determine the purposes for which, and the manner in which, any personal data is processed.

Data processors in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Data users are our employees whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times.

4 Information we collect and store

4.1 As a 'data controller'

- Our staff's personal contact details, national insurance number, pension and salary payments.
- Clients and suppliers company name, address and telephone number.

- Clients and suppliers staff contacts details, including telephone numbers, email address and position.
- Invoice history.
- Marketing contact preferences.
- Contract information.
- Web site analytics, IP address, date and time of visit and web pages viewed.

4.2 As a 'data processor'

- We provide databases and systems to allow our Client's to manage their customer data.
- Client's may host their databases and web sites on servers which we manage and maintain or they may be hosted by our Client.
- Generally we do not act as a data processor but provide facilities to allow our Client's to perform their duties as a 'data processor'
- During development and bug fixing we may hold samples of our Client's customer data on our development databases.

5 Rights of the data subjects

- If the Data Controller receives a request from a data subject for the exercise of the data subject's rights under the Applicable Law and the correct and legitimate reply to such a request necessitates the Data Processor's assistance, the Data Processor shall assist the Data Controller by providing the necessary information and documentation. The Data Processor shall be given reasonable time to assist the Data Controller with such requests in accordance with the Applicable Law.
- If the Data Processor receives a request from a data subject for the exercise of the data subject's rights under the Applicable Law and such request is related to the Personal Data of the Data Controller, the Data Processor must immediately forward the request to the Data Controller and must refrain from responding to the person directly.

6 Personal Data Breaches

- The Data Processor shall give immediate notice to the Data Controller if a breach occurs, that can lead to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to, personal data transmitted, stored or otherwise processed re the Personal Data processed on behalf of the Data Controller (a "Personal Data Breach").
- The Data Processor shall make reasonable efforts to identify the cause of such a breach and take those steps as they deem necessary to establish the cause, and to prevent such a breach from reoccurring.

7 How we collect information

- Information is provided directly from our Clients via email, telephone, letter or web forms
- Data to populate our client's systems is provided as data files: text files, MS Excel, MS Access or database backups.
- Web site traffic is captured using Google Analytics.

8 How your information is used and our legal bases for processing

We store your information for the following purposes:

- (a) Administering your contract with us and collecting any fees
- (b) Storing our client's customer data to allow them to fulfil their contractual arrangements with their customers.

- (c) To improve the information presented on our web site.

9 Your data and marketing

As a 'data processor' we will never use contact details for our own marketing purposes and we will not pass this data onto any third party companies.

As a 'data controller' we would only contact our Clients with information relating to the services we provide and any amendments to those services. We will not pass this data onto any third party companies.

10 Processing Outside of the European Economic Area (EEA)

During the course of our business operations, we store data electronically on servers at our main office, contingency site and on cloud servers located in Germany. All data is stored within the EEA.

11 Data Retention

Personal data is retained according to the following schedule. A direct contract between SiS and a Client may override these default retention periods.

Type of Data	Retention Period		Purpose of Processing
	Active Clients	Obsolete Clients	
Client/ Contacts	Indefinite	1 Year	Contract management
Our clients customer data	Variable	6 months	Our active clients decide how long they wish to retain their customer data in the systems we have developed on their behalf.
Our clients test data	2 years	6 months	
Invoices	7 years	7 years	Financial audit trail

12 Data Security

- Personal data is not permitted to be transmitted in an unencrypted format.
- Data is permanently erased in accordance with our data retention timescales.
- Information is stored and accessed by 'Data users' in accordance with Industry best practice.

13 Your Rights

Under the Data Protection Act and GDPR you have the following rights:

- to obtain access to, and copies of, the personal information that we hold about you in a reasonable; format specified by you. Where we act as a 'data processor' this information will be passed to you via your 'data controller';
- to require us to correct personal information we hold about you if it is incorrect;
- to require that we cease processing your personal information if the processing is causing you damage or distress;
- to require us not to send you marketing communications. We would never send marketing communications when acting as a 'data processor';
- to require us to erase your personal information;

- to require us to restrict or object to our data processing activities;
- if you are not satisfied with how we are processing your personal information, you can make a complaint to the Information Commissioner.