



## Privacy Notice

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1	19.05.18	Steve Ashman	Initial Draft

### Distribution

Name	Title
Everyone	Generally Available

### Approval

Name	Position	Signature	Date
Gary Downes	Managing Director		

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## **1 Introduction**

Solutions In I.T. are committed to upholding our responsibilities under General Data Protection Regulation (GDPR) EU 2016/679. GDPR requires that we provide a Privacy Policy that is jargon-free, and this is our policy.

## **2 What GDPR-applicable Data We Hold**

We collect and hold personal data in the following formats:

### **2.1 Customer and Prospect Data**

We hold customer data, including names, roles, organisation, contact details. This information is held on the following:

- Our internal Business Management Systems.
- Our Email and Contact System, Office 365
- Electronic customer Back-Up Data, which is encrypted in transit and in storage.

### **2.2 Supplier Data**

We hold supplier data including names, roles, organisation, contact details. This information is held on the following:

- Our internal Business Management Systems
- Our Email and Contact System, Office 365

### **2.3 Employee Data**

We hold employee data including, names, roles, contact details, personal details. This information is held on the following:

- In hard-copy format, held in secure filing and accessed only by SIT Management
- Sage Payroll Management System held our accountants, Needham Hall and Co, Bedford.
- Contact details are held in our Email and Contact System, Office 365.

## **2.4 SIT System Back Up Data**

Electronic data encrypted in transit and in storage.

## **2.5 Lawful Basis of Processing Data**

There are six lawful bases that can be applied for processing your data:

- Consent
- Contract
- Legal Obligation
- Vital Interests
- Public Task
- Legitimate Interests

## **2.6 Applying the Legal Bases**

The data we hold complies with this requirement as follows:

## **2.7 Customer Data**

- Legitimate interest – for example we hold the contact details for the persons responsible for paying and receiving invoices.
- For marketing purposes: Legitimate interest. As a user of our products, our marketing materials are important to ensure you know of the latest options available and how you can make better use of your system. You can opt-out of such updates if required.
- For quotation, tendering, support or Backup purposes: Contractual.
- For project management purposes: Contractual

## **2.8 Prospect Data [business to business use only];**

- All prospect data is carefully researched, purchased from reputable GDPR compliant companies, and validated by telephone before being added into our CRM system for use. We hold data such as company name, company address and designated contact data for such services. All prospect companies are in specific engineering markets, especially suited to our software that is niche in its use and application and therefore of legitimate interest to those companies in such sectors.
- Such prospects can opt-out of marketing at any time.

## 2.9 Supplier and Subcontractor Data

- For purchasing, contracting, quotation or tendering purposes: Contractual
- For project management purposes: Contractual

## 2.10 Employee Data

- Legal Obligation

## 3 Data Processors

- We act as Data processors for many of our customers.
- We use third parties to process personal data. These third parties are:
  1. I-Dash Ltd, St Neots who are Microsoft partners and provide Azure Cloud Storage and processing services they have confirmed GDPR Compliance and all data is stored in the UK or EU.
  2. FHG Software, Harlow who are EMIR support developers and partners and need access to customer's data for support purposes.
  3. Confluent of Greenville, USA who are our development partners for Workshop Routing and need access to customer's data for support purposes.
  4. Swipe and Tap of Leicester who are our development partners for Smart Site and need access to customer's data for support purposes.
  5. Microsoft who also provide Office 365 for our email and communication services.

## 4 Keeping your Data Secure

- We are committed to ensuring the data we keep is secure. Our premises are secured by intrusion detection systems, and our IT systems are secured with relevant protection suites. The data processors we use have demonstrated their safe handling of data.

### 4.1 Keeping your Data Relevant

- We will only keep data that is relevant. We will delete any data that is redundant, and we will not keep data without good reason.

### 4.2 Data Requests

- You can ask us what personal data we hold about you, and we must give you that information free of charge, within one month of your request.
- You can ask us to amend your data where the accuracy is in question.

### **4.3 Deleting Data**

- If you ask us to delete your data, we will process your request and advise you of progress.

### **4.4 Data Breaches**

- We have standard operating procedures in place to ensure data breaches are identified and remedied. We will contact you if any of your data is included or effected in the data breach.

### **4.5 Buying or Selling Data**

- If we choose to buy personal data, we will ensure that the seller is GDPR compliant, and that all persons whose data is sold, has explicitly consented to their use of that data.
- We will not sell your data.
- Should our organisation be sold to another person or business in the future, your data may also be transferred to the new organisation. However, that data may only be used for its original lawful basis. You can still opt out, request information, or request the deletion of your data.

### **4.6 Data Retention**

- We will not hold data for longer than is necessary
- We will make efforts to ensure that the data we hold is up-to-date and accurate

### **4.7 Information Security Manager**

Our appointed Information Security Manager is G Downes, Managing Director. If you have a question relating to this policy, please contact him via [sales@solutionsinit.com](mailto:sales@solutionsinit.com).