

GDPR Statement

Colleague

The EU General Data Protection Regulation (“GDPR”) comes into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

Our Commitment

Colleague Software are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR.

Colleague Software are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our policies for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

How We Handle Personal Information

Policies & Procedures

New data protection policies and procedures have been implemented to meet the requirements of GDPR and relevant data protection laws, these are:

- **Data Protection** All company storage locations which holds personal information are encrypted to the highest standard. This includes our CRM databases, file locations and remote access. All cloud data is secured by Microsoft Azure Active Directory and all access is audited and monitored.

- **Data Retention & Erasure** New policies have been created to ensure data meets the “data minimisation” principles and that personal information is stored, archived and deleted compliantly. We have procedures in place to ensure we meet any “Right to Erasure” requests, along with any exemptions, timeframes and notification responsibilities.
- **Data Breaches** We have procedures in place to identify, assess, investigate and report any personal data breach at the earliest possible time.
- **Third-Party Disclosures** We carry out due diligence checks with all recipients of personal data to assess and verify they have the appropriate policies and safeguards in place to protect personal information.
- **Subject Access Request (SAR)** We have put in place procedures to accommodate the 30-day timeframe for providing the requested information. We have ensured these requests are free of charge.

Data Processing

We regularly review our data processing activities to ensure that it is appropriate for the activity it relates to. We also maintain records of our processing activities to ensure that our obligations under Article 30 of the GDPR are met.

Legitimate Interest

Colleague Software collects and processes personal information under the principle of legitimate interests, as defined under the GDPR. We have undertaken the relevant assessments to ensure all personal data meets the legitimate interest criteria, further information can be found in our Legitimate Interest Assessment document.

Direct Marketing

We have clear opt-in and opt out processes for marketing subscriptions. We provide unsubscribe features on all marketing materials.

Processor Agreements

Where we use third-parties to process personal information on our behalf we carry out due diligence procedures to ensure that they follow and understand their/our GDPR obligations.

Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we offer to provide individual's right to access any personal information that Colleague Software processes about them and to request information about:

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint and who to contact in such instances.

Information Security & Technical Measures

Colleague Software takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures, including:

- Encryption
- Access Controls (including 2 stage authentication)
- Password Policy
- Remote Access Policy
- Mobile Device Policy
- Confidential Information Policy
- Advanced Threat Detection
- Audit Logging

GDPR Roles and Employees

Colleague Software have designated Trevor Etherington as our Data Protection Officer (DPO) and have implemented our roadmap for complying with the new data protection Regulation. The DPO is responsible for promoting awareness of the GDPR across the organisation, continued assessment of our GDPR policies and procedures, identifying any gap areas and implementing the new policies, procedures and measures.

Colleague Software understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans. We have implemented an employee training program which will be provided to all employees prior to May 25th, 2018, and forms part of our induction and annual training program.

If you have any questions about our processes for the GDPR, please contact GDPR@colleaguesoftware.com
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