



KBSoftware

Privacy Notice

1. Process Controller's identity and contact details

KB Software Ltd act both as a data controller for their own business information and a processor for their customers. You can contact us by emailing info@kbsoftware.co.uk

2. What information is collected

We store your company name (if applicable), full name, address(es), phone number(s), email address(es) and website (if applicable). If you wish us to access equipment or accounts on your behalf we will also record any account details, usernames and passwords you provide us.

3. How your information will be used

No information is ever passed to a third party. We use your information only to communicate with you, bill you and deliver the services you have requested us to provide.

4. Legal basis for processing your data

Our legal basis for processing your data is three fold:

- a. The contract (verbal or written) between us to provide information, quotations or the service requested.
- b. Our legal obligation to maintain registered accounts.
- c. Your explicit consent is given when you read this notice and then choose to provide the requested information. Or, if you make verbal contact with us we will make you aware of where to find this information and outline it to you.

5. Who receives your information

Only persons working for and with KB Software will have access to the information, and only as much as is required to carry out your request or the services requested by you.

Although they do not have access to our systems, we do use sub-processors for cloud storage and servers on which we store information and websites. We also use email and payment companies. The sub-processors we use are:

- | | |
|------------------|---------------------|
| a. CloudSpace | g. Malcolm Dinsmore |
| b. Digital Ocean | h. Nominet |
| c. Linode | i. Rsync.net |
| d. Liquid Six | j. SparkPost |
| e. Mandrill | k. Stripe |
| f. MailChimp | l. Tim Bushell |

6. Where your information is stored and how it is kept secure

Your information storage and security depends on what we hold on your behalf:

- a. Personal information is stored within our CRM system which is accessible only by passworded accounts given to users authorised by KB Softwares directors. The CRM system is hosted on a cloud server operated by Linode. The system is also available on our personal laptops which are password protected.
- b. Accounts details, usernames and passwords that you give us for access to equipment and accounts on your behalf are held on passworded laptops.
- c. Contractual information, quotations, as well as specifications, documents and information related to specific services or projects we are required to undertake for you are kept on:
 - i. Google Drive. Access to these is via controlled passworded accounts. Additional Share Permissions on the folders ensure that access to your information is by only those who need it.
 - ii. Very occasionally we may use Dropbox and the same controls are utilised.
- d. Information to access any equipment and accounts on your behalf is kept only on our personal laptops which are password protected.
- e. The CRM is backed up to a cloud server each night. The server is operated by Rsync.net. SSH keys are used to encrypt the data as it is transferred to the Cloud Server. The data held on the server is encrypted AES-256 in counter mode and authenticated using Poly1305-AES. Access to the backed up data is only from our laptops through the encrypted SSH connection.
- f. If you ask us, or if we decide it is necessary prior to a repair, to back up data from your device, the data will be copied to an External Hard Disk Drive. This drive is always kept securely in property owned by us.
- g. If you have asked us to register your website with Google Analytics then data from every visit / visitor to your website will be collected but personally identifiable information is not stored. A visitor's IP address (which is now recognised as personal data by GDPR) is used to determine their physical location but the IP address itself is not data that can be accessed through Google Analytics. All data in Google Analytics is aggregated and anonymised.

7. Transfers of data to 3rd countries and safeguards in place

Data is held on EU data protection compliant servers. The only information we hold that might be transferred to 3rd party countries is:

- a. Contractual information, quotations, as well as specifications, documents and information related to specific services or projects we are required to undertake for you are kept on:
 - i. Google Drive (G Suite). Google's certification under the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks includes G Suite and Google Cloud Platform. They have also gained confirmation of compliance from European Data Protection Authorities for their model contract clauses, affirming that their current contractual commitments for G Suite and Google Cloud Platform fully meet the requirements under the Data Protection Directive to legally frame transfers of personal data from the EU to the rest of the world.

- ii. Occasionally Dropbox. Dropbox relies upon a variety of legal mechanisms for its international transfer of personal data from the EU to the United States. They are certified under the EU-U.S. and Swiss-U.S. Privacy Shield Programs regarding the collection, use, and retention of personal data and its transfer from the EU and Switzerland to the United States. In addition to Privacy Shield, Dropbox also provides strong contractual guarantees around the privacy of its services and relies on EU Model Contract Clauses to cover its international transfers of data.
- b. Google Analytics data for your website is covered by the same certification as per 7.a.1. above.

8. How long your information will be kept

This depends on the information you provided us with:

- a. Your personal data is kept for as long as you are a customer. Sufficient information (e.g. Invoice details) in order to fulfil our legal obligation for producing accounts is kept for as long as is required by the HMRC, but at least 7 years.
- b. Contractual information will be kept for the period you remain a customer and for 12 years after our relationship ends. Quotations will be kept while you remain a customer.
- c. Information to access any equipment and accounts will be held as long as required to provide the service plus a further 6 months. If you cease to be a customer they will be permanently deleted.
- d. Backed up information is kept for 6 months.
- e. Information copied to an External Hard Disk Drive is held for 3 months unless you request that we hold it for longer. Then we will hold it for as long as is required (A charge may apply for this).
- f. Google Analytics data is retained for 38 months by default. You can request alternative retention periods.

9. Your rights

Under GDPR you have a number of rights for which we must provide, those that apply to the data we hold are listed below but more information is available here:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

- a. You should be informed by us about how we use your data (this documents fulfills that obligation)
- b. You can request a copy of what information we hold on you.
- c. You can ask us to correct any errors in the information we hold on you
- d. You always have the right to require us to delete information for which we have no legal obligation to keep.
- e. You can request us to provide the information we hold to be provided in a .csv format for transfer to another organisation.

10. How you can make a complaint

If you are unhappy with anything you can complain. Here's how:

- a. First, please let us know so we can put things right. Email to us at info@kbsoftware.co.uk
- b. If we don't resolve things to your satisfaction then you can report us direct to our supervisory authority, the Information Commissioner's Office, by ringing 0303 123 1113 or via live chat at their website: <https://ico.org.uk/concerns/>.
- c. More Information can be found here: <https://ico.org.uk/for-the-public/raising-concerns/>

11. More information

- a. Our Privacy Policy is here: https://www.kbsoftware.co.uk/media/link/document/GDPR_Privacy_Policy_-_31-10-2019_Rev1.pdf
- b. Our Data Protection Policy is here: https://www.kbsoftware.co.uk/media/link/document/GDPR_Data_Protection_Policy_-_31-10-2019_Rev1.pdf