

## **GDPR Compliance statement**

### *What is GDPR?*

Compliance with the GDPR is mandatory when 'processing' (collecting, using, storing, transferring) personal data of any EU citizen no matter where in the world the data is processed, and is also mandatory for any organisation established in the EU. The GDPR regulates, among other things, how individuals and organizations may obtain, use, store, share and delete personal data.

### *Our commitment*

Blue Spot Computers 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.

Blue Spot 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 preparation and objectives 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.

### *Data controller or processor?*

We act as a data controller in respect of any information which we collect about our customers networks / system and their information. We will never share this or any customer data in our possession with anyone else save as required by law or if we were to sell our business. Blue Spot Computers adheres to strict data security, access, integrity policies.

### *What data is processed?*

Blue Spot Computers only processes data necessary to fulfil the companies duties of successfully providing IT support and other services as requested by the client, the following information may be stored by Blue Spot:

- **Network information** – this includes details such as: Administrator usernames & passwords, Network IP addresses, Shared drive addresses along with access credentials, web hosting provider credentials, broadband login information, equipment location and photographs to assist support Blue Spot employees in providing remote support.
- **(Business) Personnel information** – This includes data such as: names, email addresses and business contact information, this information will be used to provide remote support to relevant users and will also be used to distribute emails by Blue Spot with technical advice and information on a mailing list basis.
- **Direct debit information** – This includes account holder information and email information provided by yourself, all Direct debit information is processed by our 3<sup>rd</sup> party supplier GoCardless and Blue Spot Business Ltd. Does not hold any account or banking information on file.

The above data is collected with the sole purpose of providing services requested by the client / individual and will never be shared with any third parties as outlined in the 'Data controller or processor' section. This information will be kept on file for as long as necessary to continue providing the services required. Information is kept on file until it is requested to be deleted (in line with the right to erasure) to enable us to supply records of network information to companies or individuals who are no longer a customer of Blue Spot.

### *How do we facilitate the Rights of Individuals under GDPR?*

#### *The right to be informed.*

Our maintenance support contracts have been overhauled to feature what information we may keep on file for any customers along with what is outlined in this document. Personal customers also sign a document agreeing for email marketing to take place.

#### *The right of access.*

System administrators who request access can see any information both personal and with regards to network information held about them and the company. This data is held within the central CRM system used by Blue Spot Computers and is accessible at any time on request. This information can also be provided via email if requested. This information can be provided quickly and efficiently due to the central location should the need to meet the deadline of 30 days to respond to a data access request be required.

#### *The right to rectification.*

Blue Spot support staff can update an individual's personal details or network information with regards to your company network if requested. This information can be checked by delegated company administrators as set out in 'The right of access' section.

## *How do we facilitate the Rights of Individuals under GDPR? (cont.)*

### *The right to erasure.*

Blue Spot complies completely with an individual's request for the deletion or removal of data from the system. If our customers are satisfied that there is no compelling reason for continued processing of their individual data or company network information, they can request that Blue Spot delete the personal data from the CRM.

### *The right to restrict processing.*

This does not apply due to the nature of data processing, data is only kept on file to enable Blue Spot to successfully fulfil the companies duties of providing IT support and other services as requested by the client

### *The right to data portability.*

With access on request for any delegated systems administrators, this access can be used to view details which can be transferred electronically to the individual or to a 3rd party to fulfill an individual's request. We can also on request export this data for you. This data would go beyond the basic requirement of the 'right of data portability'.

### *The right to object.*

Although email communications are only done after permission is given by the customer, Blue Spot computers enforces the right to object and gives Individuals have an absolute right to stop their data being used for direct marketing.

### *Rights related to automated decision making and profiling.*

No decisions are made without human intervention.