

**General Data Protection  
Regulations (GDPR) - Privacy  
Policy  
APTECH SYSTEMS LIMITED**

**May 2018**

## Introduction

The General Data Protection Regulations (GDPR) apply in the UK from 25th May 2018 and replace the Data Protection Act (DPA). The GDPR has many similarities to the DPA but technology has changed since 1998, and the GDPR reflects this to protect everyone's' privacy and personal data in today's digital world.

As an organisation, we will need to do some things differently in the way we collect, store, use and manage personal data and all staff, associated contractors and sub-contractors will need to ensure compliance.

This privacy policy sets out the ways in which we may collect and use personal information. Please read this policy carefully as it sets out who we are, how and why we collect, store, use and share personal data and your rights in relation to personal data and how to contact us should you wish to raise a concern about the way in which personal data information is used.

## Who are we?

Aptech Systems Ltd is a supplier of IT support and development services. Our registered address is:

9-15 Hitchin Street  
Baldock  
Hertfordshire SG7 6AL  
UK

## Data for which Aptech Systems Ltd is the Data Controller

### Purpose and consent for collection

Aptech Systems Ltd collects, stores, processes or transmits this data in order to provide Services to Customers, and its personnel may include Data Subjects. This may include marketing of the Services, the processing of orders for Customers and customer support activities, or for the purposes of conducting corporate activities such as interacting with suppliers, job applicants or other interested parties. (Collectively, the 'Scope'.)

By providing personal information to Aptech Systems Ltd in any of the ways described in this policy, by instructing or authorising another party to provide such information or by entering into a contact with Aptech Systems Ltd that requires such processing, the Subject is agreeing that they are authorised to provide the information and that they accept this privacy policy and that Aptech Systems Ltd is authorised to process it.

### How do we collect Personal information?

By submitting personal information to Aptech Systems Limited, you consent to the use of that information as set out in this policy. Aptech Systems Limited may collect or be provided with information in a number of ways.

- Postal – Letters, completed forms, payments
- Website – completion of forms, requests for information
- Internet – entering details into search engines, forms
- Email – emails received from customers and third parties

### Why do we collect Personal information?

The purposes for which personal data is collected and used by us include personnel, administrative, financial, payroll and business development purposes. These include the following:

#### **4.1 Business use**

We collect data for our core business purposes, staff administration (including payroll), accounts and records (ie invoices and payments), advertising, marketing and public relations (in connection with APTECH SYSTEMS LIMITED business activity).

#### **4.2 Personnel / HR / Regulatory**

For compliance in relation to the gathering and processing of information relating to identifiable individuals, such as job applicants, qualifications, training and development, health and attendance records.

## **What Personal information do we collect?**

Aptech Systems Limited collects and stores and processes our client and supplier information in relation to core business purposes, staff administration (including payroll), accounts and records (ie invoices and payments), advertising, marketing and public relations (in connection with APTECH SYSTEMS LIMITED business activity).

We may collect and process the following information about you:

#### **5.1 Aptech Systems Limited Staff**

When applying for a role with Aptech Systems Limited we may collect and process the personal data that you submit to ensure that we comply with our regulators requirements. This may include:

- Name, address and contact details
- Marital status, nationality, job titles, and CV

#### **5.2 Consultants and Contractors**

We may collect and process data that is provided by you or your organisation to us. Personal data may include:

- marital status, nationality, job title
- contact details
- financial and payment details

This data remains on Aptech Systems Limited systems for as long as:

In the case of staff; for up to 1 year after they leave employment

In the case of consultants and contractors/suppliers; for up to 5 years after their last dealings to the company

## **What do we use Personal Information for?**

We may use the information for legitimate company business and processes such as those listed below:

#### **6.1 Business use –**

- operational reasons, such as contacting clients/suppliers/contractors
- processing invoices and payments
- investigating complaints
- gathering information as part of investigations or in connection with legal proceedings or requests

- ensuring business policies are adhered to (such as policies covering email and internet use)
- checking references, ensuring safe working practices, monitoring and managing staff access to systems and facilities and staff absences, administration and assessments
- monitoring staff conduct, disciplinary matters
- marketing our business
- improving services

## **6.2 Personnel / HR / Regulatory**

- undertaking recruitment and selection procedures
- following termination processes
- contracting purposes
- performance management
- maintaining and updating training and development record,
- monitoring absence records,
- supporting individuals needs
- processing of payments and/or salaries

## **6.3 Law**

Where required by law, we may also process your personal data, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

## **Where do we store data?**

All data in Aptech Systems Limited systems is stored on a secure set of servers within Aptech Systems Limited's business premises and UK data center.

## **Who do we share personal information with?**

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

At no time will any personal data held by Aptech Systems Limited be passed to organisations for marketing or sales purposes

We will share personal data with law enforcement or other authorities if required by applicable law.

We may share your personal data with Aptech Systems Limited contractors including: legal and other professional advisers, consultants, and professional experts; service providers contracted to us in connection with the provision of the products and services. We will ensure that there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

## **Data retention**

We will keep your personal information for as long as you are a customer of Aptech Systems Ltd.

After you stop being a customer, we may keep your data for up to 10 years for the following reasons:

- To respond to any questions or complaints.
- To comply with the legal requirements

## **Data transfers and the use of Data Sub Processors**

Aptech Systems Ltd will not share Subject data with a third party not directly associated with the provision of services without their explicit consent. Aptech Systems Ltd will also not transfer Subject data to a third party country outside of the UK or EEA that is not compliant with the applicable data protection laws via adequacy agreement, Binding Corporate Rules or other legally appropriate means as defined by the Information Commissioners Office without their explicit consent.

Aptech Systems Ltd makes use of a number of third party organisations for the purposes of delivery of Services to the Customer.

By interacting with Aptech Systems Ltd as defined in this policy, the Subject provides their consent for this transfer and use of our Data Processors and their Data Sub-Processors, and for transfer to any other appropriate third party Data Processor for the purposes of delivery of the Services and customer relationship management activities. No data transfer will be undertaken that is outside of the strict scope of the Purposes states in this policy, or that will materially degrade the security of the Subject's data or the Data Subject's rights and in any event the security provisions will be compliant with the applicable Data Protection Laws. Such Data Processors and Sub Processors will be contractually bound to process only in accordance with our instructions and to maintain technical and organisational controls in compliance with our security policy and the requirements of the GDPR.

## **Marketing**

Aptech Systems Limited maintains a marketing database that contains the basic details of individuals who have consented to Aptech Systems Limited sending information about new products or services to them, usually via email.

Should you wish to be removed from this database at any time, please notify Aptech Systems Limited by sending an email to [PRData@aptechsystem.co.uk](mailto:PRData@aptechsystem.co.uk)

## **Data breach incidents**

In line with our regulatory requirements, Aptech Systems Limited has a set of processes for issue and incident management, including data breaches. These processes include the required notifications to be sent to the Information Commissioners Office, our Regulators and to customers.

## **Your rights**

The GDPR keeps in place individuals' rights to access personal data held about them by Aptech Systems Limited known as a Subject Access Request. The length of time we have to respond to them is one calendar month.

### **11.1 The right to be informed**

You have the right to be informed if we intend to use any personal details that we hold about you for any other purpose than set out in this policy. Where Aptech Systems Limited intends to use your personal data outside of this policy it will contact you to seek your permission to do so.

### **11.2 The right of access**

You have the right to request a copy of the personal data that we hold about you at any time by contacting us at the email or postal address given below. We will send you a subject access request form to complete and return to us. There is no charge for this service. Please ensure that you include with your request information that will enable us to verify your identity. We will respond with 30 days of the request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information. Or if your request is manifestly unfounded or excessive.

### **11.3 The right to rectification**

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate, is incomplete or changes, so that we can keep your personal data up-to-date.

### **11.4 The right to erasure**

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

### **11.5 The right to restrict processing**

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, where you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

### **11.6 The right to data portability**

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

### **11.7 The right to object**

Each marketing email that is sent to you or where you visit our website, this will provide you with the ability to 'unsubscribe' from receiving marketing emails at any time, alternatively please contact us at [unsubscribe@amcofm.co.uk](mailto:unsubscribe@amcofm.co.uk)

## **Commitment to confidentiality and security of processing**

Aptech Systems Ltd will use appropriate technical and organisational security measures within our sphere of responsibility to ensure an appropriate level of confidentiality, integrity and, where Aptech Systems Ltd is the Data Controller, availability of Subject data and to ensure its availability in the event of a business continuity incident. Aptech Systems Ltd will undertake security and data protection assessments of any third parties we elect to use prior to transfer of any Customer Data and regularly thereafter.

Whilst Aptech Systems Ltd maintains configured encrypted endpoints for VPN, Control Panel HTTP and HTTPS communication and appropriate internal security controls, the Subject retains sole responsibility for their data when outside of Aptech systems Ltd.

## **Contact us**

If you wish to know more about the personal data held by Aptech Systems Limited, or contact us in relation to any of your rights set out above please email Aptech Systems Limited at [PRData@aptechsystem.co.uk](mailto:PRData@aptechsystem.co.uk)

## **Complaints**

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint through the applicable supervisory authority or to seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

## **Changes to our Policy**

This policy is reviewed on an annual basis to ensure that the information it provides remains accurate and meets regulatory requirements.