



Privacy Policy (End Point Application)

Document Details

Description

This document is a privacy policy covering stored client data of a personal nature. This policy differs from the Privacy Policy (General), in that this document covers data which is not *utilised* by Esferico Ltd., and is instead stored and processed automatically by Esferico Ltd. on behalf of the client, such as within application databases under the direct and / or indirect instruction and control of the client (e.g. cloud applications).

This document therefore only covers the privacy policy relating to storage, automated processing, and any manual processing required during client requested operations such as import, export and fault investigation.

For every day use of this stored data, the client should have their own privacy policy in place.

This document was originally heavily adapted from the general Privacy Policy document at the GDPR EU project funded by the European Union.

History

Effective date of this document: 3rd December 2020

Document Owner: Esferico Ltd.

Version	Date	Description	Author
1.0	[unknown]	Initial author	GDPR EU
1.1	2018-09-21	Adaption to Esferico Ltd.	ESF-VPT
1.2	2020-12-03	Adaption to reflect UK GDPR implementation.	ESF-CR

Privacy Policy

This privacy policy will explain how our organization stores and performs limited processing of personal data that is volunteered by the client for storage within Esferico Ltd. databases.

What Data Do We Collect?

For information on what personal data is collected, or is possible to collect within Esferico Ltd databases, see the specific data description document covering the application(s) in use by the client.

How do we collect your data?

The only personal data collected for use within Esferico Ltd. applications is collected from the client in three possible ways:

- As part of a secure, initial data import utilised during the initialisation of the client's purchased or subscribed product (see the Data Handling document for methods of provision)
- As part of occasional secure data transfers containing bulk data for database update (see the Data Handling document for methods of provision)
- As part of the client everyday use of the purchased or subscribed application

In all cases, no data is collected and applied to application databases other than through client initiated data submission.

What Data Do We Do With the Data We Collect?

Esferico Ltd. collects your data for only one purpose:

- Provide the service which the client has purchased / subscribed to.

In providing this service however, Esferico Ltd. may be required, on client authorisation to:

- Reform data into a form suitable for storage within the application
- Investigate the data for reported errors either within the data of application functionality
- Modify data by combining with new data in order to update for currency

How Do We Access Your Data?

Only suitably authorised and trained Esferico Ltd staff directly connected with supporting the product purchased or subscribed to will view data being processed or investigated on behalf of the client. Other Esferico Ltd. staff unconnected to the product will have no access to stored data.

Access to client data will be performed only via either:

- Secure remote access to the application that has been purchased or subscribed to, in its native secure environment
- On a secure workstation, using secure communications methods, within a property deemed to be the normal operating environment of Esferico Ltd. or its staff.

How Do We Store Your Data?

Esferico stores data in one of two forms:

- For a limited time (usually 1 month) data provided to Esferico Ltd. is stored in its original secure format, as provided by the client on a secure and encrypted server for data queries which may arrive soon after initial processing. After this period, the source data is destroyed.
- Once processed, the data is stored only in a secure encrypted database (to a minimum of 128-bit AES, and preferably at 256-bit AES as capable of the database in use) typically accessible only to the purchased or subscribed application and data support tools where required.

Marketing

Esferico Ltd. performs no marketing or other commercial activities using data stored within application databases. Esferico Ltd. Makes no claim to ownership of personal or public domain data.

Note: Database format, schema, and meta-data generated to support or deliver client data within the application environment remains the property of Esferico Ltd.

What are the Required Data Protection Rights?

As storage and processing of the data is only at the behest of the client in order to provide the services attributed to the purchased or subscribed application, everyday maintenance of the data content is fully the responsibility of the client.

As per the GDPR and other Data Protection legislation, the client should ensure that their own privacy policy includes provision for:

- The right to access – provide the right to request copies of personal data by the individual. The client may charge you a small fee for this service, but most Esferico Ltd. applications provide the ability access stored personal information as a free standard feature of the application after secure login by the individual.
- The right to rectification – provide the right to request that correction of any information believed to be inaccurate. The client should also provide the right to request completion of information believed to be incomplete.
- The right to erasure – provide the right to request eraser of personal data, under certain conditions. Note that usually the need to provide the service intended by the purchased or subscribed application can mitigate the clients responsibility in this area, but may require some form of data anonymisation under certain conditions.
- The right to restrict processing – provide the right to request that there be a restriction placed on the processing of personal data, under certain conditions. Also see above, regarding mitigation.
- The right to object to processing – provide the right to object to the processing of the personal data, under certain conditions. Also see above, regarding mitigation.
- The right to data portability – provide the right to request the transfer of data that has been collected to another organization, or directly to the individual, under certain conditions.

Privacy Policies of Other Websites

Occasionally, data that you store within Esferico Ltd. applications may result in links to external websites or data.

Neither the privacy policies of Esferico Ltd. nor that of the client applies to linked websites and data which are not under the direct control of the application. If links of this nature are provided, the client should investigate the privacy policy *and suitability* of those external links prior to making them available under both Data Protection and (in the case of educational clients) Child Protection legislation.

Changes to our Privacy Policy

Esferico Ltd. keeps its End Point Application Privacy Policy under regular review and places any updates on this web page. This privacy policy was last updated on 3rd December 2020.

How to Contact Us

If you have any questions about Esferico Ltd's End Point Application Privacy Policy or the data we hold on your behalf, please do not hesitate to contact us.

Our email: dpo@esferico.net

Call us at: 0208 123 7979

How to Contact Us

Should you wish to report a complaint or if you feel that Esferico Ltd. has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Website: <https://ico.org.uk>