

## **PRIVACY POLICY, GDPR & RISK ASSESSMENT**

This policy explains when & why we collect personal information about people who visit our website and use our services, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this policy from time to time so please check this document occasionally to ensure that you are happy with any changes. By using our website you are agreeing to be bound by this policy.

### **Who Are We ?**

We are SC Inventories, an independent inventory company providing services to Agents, Businesses, Landlords & Tenants. We provide inventory compilations, check in & check out services, property inspections and also products to assist with the workings of the lettings business.

### **Definitions**

**GDPR** : General Data Protection Regulations

**PII** : Personally Identifying Information

**The Company** : SC Inventories

**SC Inventories** : SC Inventories and software partner

**Clients** : All customers who provide The Company with PII in the context of report fulfilment

**Contractors** : SC Inventories Clerks

**Service** : Inventory, Check-in, Mid-term, Check-out and Compliance reports or other property reports and service offered by SC Inventories

## **GDPR**

The Company meets that required within the GDPR; a legal requirement from the 25th May 2018. GDPR applies to any organisation or entity which processes PII for any person (data subject) who is a resident of the EU, and as such, The Company complies with GDPR regulations.

## **Usage**

Any PII provided to The Company by a client will be used solely for any previously agreed upon Service to the client and their customers (Landlords and Tenants) via SC Inventories Contractors.

SC Inventories collects personal information when you register with us or place an order for products or services. Personal information that you supply to us may be used in several ways:

- To allow us to fulfil the terms of our contract with you
- For statistical analysis
- To contact Tenants and Landlords to arrange meeting times
- To deliver reports to Tenants and Landlords
- To verify Tenants' feedback
- To supply clients with delivery logs and other report verification and evidence.
- For feedback on service levels provided

We will use this information to provide the services requested, maintain records and, if you agree, to send marketing information.

We will not disclose any information to a person or organization outside SC Inventories for any other reason unless required to do so by law.

## **Accountability**

Any client is welcome to copies of any detailed procedures and policy documents on request. Any client is welcome to audit the security procedures and technical measures at the company's Head Office providing it is at the client's expense.

### **What data is held and where?**

When we process a new customer signup, we collect a name, email address, telephone number and optional company name.

This data is distributed to:

- Our Platform database to create the User Account. Hosted by Amazon in Ireland (see [Amazon Web Services & GDPR](#))
- Our Email server (Omitting telephone numbers) as a registration email copy. Hosted by Google (See [Google & GDPR](#))
- Our internal CRM system, for logging sales and customer service notes and tracking deals.
- Our Newsletter system, collecting email addresses to add to our 'All Subscribers' list . Hosted by Mailchimp (See [Mailchimp & GDPR](#))
- Internal Spreadsheets (Name and company only)
- Cloud Storage (Hosted by Google and Dropbox. See [Dropbox & GDPR](#))

### **Who has access to this data?**

Data is strictly accessible by SC Inventories, specifically for the purposes of services, supporting the software and customer.

People who handle customer information within the business fall into 3 categories:

- SysOps & SC Inventories Management – Full unrestricted access to databases, servers and accounts with customer information and data for the purposes of services sales and support
- DevOps & SC Inventories Clerks – Restricted access to databases and servers with customer information and data for the purposes of services and support
- BizOps & SC Inventories Other Staff – Limited access to accounts with customer information and data for the purposes of Sales, Marketing or Support.

### How we are complying with GDPR ?

- **Right to rectification**– You're able to edit account information at any time through your SC Inventories client area and profile. You can also reach out to us directly to edit or update your information on your behalf. **Right to be forgotten** – You may cancel and terminate your SC Inventories account at any time. If you terminate your account, you will be offered to permanently erase all of your data. After receiving a request to be forgotten, we will permanently delete your account and all data associated with it within 30 days of receiving the request.
- **Right to object** – At any time, you may object (via opt out) to your personal data being used for specific purposes such as direct marketing, research, etc, via email at [info@scinventories.co.uk](mailto:info@scinventories.co.uk)
- **Right of access** – We're transparent about the data we have and how we use it. You can Contact Us at any time if you'd like to access or edit your data or if you have any questions about your data and how we're using it.
- **Cloud Storage** – When we receive a request to be forgotten, or we are simply no longer using particular records, we will permanently erase that data on all Cloud Storage Drives and devices where that data is stored.
- **Our CRM system** – When we receive a request to be forgotten, or we are simply no longer using particular records, we will permanently erase that data on our CRM system and devices

### How SC Inventories will help you to comply with GDPR ?

GDPR expands privacy protections and rights to our customers too. SC Inventories will help you comply with requests you receive that fall under GDPR regulations:

- **Right to rectification** – You can update Client and Contact information at any time. Your contacts can reach out to SC Inventories directly and we'll correct or delete that information for them.
- **Right to be forgotten** – If you receive a request to be forgotten, you're able to delete a contact, which permanently removes their information from your account. If your contact reaches out to us directly with a valid request, we'll notify you about the request and delete the contact's data from your account, or across all SC Inventories accounts, if requested, in order to comply with GDPR.
- **Right of portability** – If your contact requests their personal data, you can export or print their data from your browser, which we make available to you via a secure connection.
- **Right of access** – Make sure that your existing Privacy Policy addresses how you'll use and manage your customer's data. If your contact requests their personal data, you can export or print their data.

**Data Protection Officer (DPO)**

Whilst the company has no legal requirement to appoint a DPO, the company has chosen to do so in the interests of maintaining a commitment to data protection.

The contact details are:

For the Attention of the Data Protection Officer, email at [info@scinventories.co.uk](mailto:info@scinventories.co.uk) or by phone on 01202 830517

## **Data Controls and Risk Management**

- SC Inventories has a comprehensive secure development and data protection policy in place as well as a number of physical, procedural and software-based methods to protect any data hosted by our software processing partners. This includes
- Dedicated firewalls which block all except essential ports from accessing our servers.
- A process of regular automated scanning for security vulnerabilities by an accredited Automated Scanning Vendor (ASV)
- Ensuring that all access to our systems is performed over SSL (Secure Socket Layer) using perfect forward secrecy where supported by the client web browser. Our SSL configuration is tested regularly using a third-party SSL strength tester.
- All remote access from our office is performed over encrypted links.
- Our local network is configured with strong passwords and automatic lockouts
- All servers are configured with intrusion detection systems which track a number of suspicious events such as: remote logon outside normal hours, software installation, service modifications, etc.
- All system changes, updates, new features and bug fixes are reviewed for any risk of data leakage by The Company with appropriate testing before release.

## **Security breach notification process.**

All production servers and our software partners are set up with a custom intrusion detection system that monitors a number of key events. These include

- Modification of firewall rules
- VPN access to the office
- Login to the production systems outside work hours
- Installation of software
- Updates to Windows Services
- Addition and modification of users and user groups

Upon detection of any of these events, our support team is immediately notified by email and will investigate. Windows event logs are expanded in size on all production systems to allow us to further investigate any potential breach and once the impact is known, clients would be notified immediately.

Staff and all SC Inventories representatives are also required to notify the, DPO immediately if they think that any passwords or physical access tokens they use to access either production systems or our internal network have been compromised.

### **SC Inventories Password and Training Policy**

It is SC Inventories policy to change passwords on a regular basis and provide training as required on policy changes.

The Company's procedures keep in mind data protection and the rights of the data subjects. For example, The Company and or The Contractors will not communicate any information over the phone or by any other means without the requestor's identity and right to information verified.

All Data Processors as well as SC Inventories Head Office employees have training in data protection and data subject rights with procedures in place to handle any information requests The Company may receive.

### **SC Inventories Binding Corporate Rules**

SC Inventories do not perform intra-organisational transfers of personal data across borders and as such do not follow Binding Corporate Rules.