



This privacy notice tells you about the ways in which SGA Systems Ltd may hold and use personal data.

Under the terms of the General Data Protection Regulations (GDPR), SGA Systems Ltd is the Controller of the personal data it holds and uses; the GDPR refers to the holding and use of personal data as 'Processing'. You can find our contact details at the end of this document.

For further information on the General Data Protection Regulations, please refer to the website of the Information Commissioner, <https://ico.org.uk>

What is the purpose of the processing and what is the lawful basis for processing:

The purpose of the data is to facilitate normal business operations.

The lawful basis for the processing is legitimate interest. The legitimate interest of SGA Systems Ltd in processing the data is to facilitate normal business operations, which would not be possible without the processing of such data.

What personal data does SGA Systems Ltd process:

SGA Systems Ltd may process personal information on any individual who has ever had any business dealings with SGA Systems Ltd, or its predecessor, Stephen Gresham Associates. In most cases, personal information will be limited to

- an individual's name
- any email addresses provided for us to maintain contact
- any telephone numbers provided for us to maintain contact

Where an individual has contacted us as part of their employment, we will know who their employer is if information regarding their employer was provided, e.g. in an email footer.

SGA Systems Ltd no longer processes any data that is considered sensitive personal data.

Where SGA System Ltd was previously provided with personal data, including sensitive personal data, in the course of its activities relating to the provision of support for the CASPA software product, such data has already been securely deleted in accordance with the our obligations under the Data Protection Act.

Where did the data SGA Systems Ltd processes come from:

Where SGA Systems Ltd is acting in the role of a customer for professional services, information on individuals may have come from their employers website or from information provided by the individual once contact had been established.

Where SGA Systems Ltd is acting in the role of a supplier, information on individuals will have come from contact initiated by the individual, or from normal business activities in the course of fulfilling contractual obligations to customers.

With whom is it shared:

Where personal data forms part of relevant business documentation, e.g. a customer's name and email address on an invoice, information may be shared with organisations contracted by SGA

Systems Ltd to provide professional services, e.g. accountancy, and with other organisations where a statutory duty exists, e.g. disclosure of business documents to HMRC.

Personal data of the types noted above may also be shared with or transferred to RSE Insight Ltd for the purpose of supporting their licensing of the CASPA software product to end-users under the terms of the Royalty Agreement between SGA Systems Ltd and RSE Insight Ltd.

Transfers to third countries:

Personal data is not transferred to any third country.

How long is the data retained for:

Where data forms part of a business record whose retention is mandatory in order to fulfil statutory obligations, such records will be kept for a minimum of six years in order to comply with UK tax legislation.

In all other cases, data will be retained for as long as the company sees fit.

Individual rights:

The GDPR provides the following rights for individuals:

- the right to be informed
- the right of access
- the right to rectification
- the right to erase
- the right to restrict processing
- the right to data portability
- the right to object
- rights in relation to automated decision making and profiling

For further information on these rights and the circumstances in which they apply, please refer to guidance provided by the Information Commissioner at <https://ico.org.uk> or Regulation (EU) 2016/679 of the European Parliament.

Automated decision making and profiling:

SGA Systems Ltd does not process data for the purposes of automated decision making and profiling.

Complaints:

Any concerns about the data we hold or the way in which we process that data should, in the first instance, be directed to SGA Systems Ltd via the contact details at the end of this document. Please note that if you are contacting us in regard to one of the individual rights listed above, the GDPR sets out the timescales for response and the circumstances in which requests must be acceded to.

If you still have concerns, the GDPR provides the right to lodge a complaint with a supervisory authority, which in the UK is the Information Commissioner. Please refer to their website for more information, <https://ico.org.uk>

How to contact us:

If you have any queries or concerns regarding the GDPR, please contact us at:
data.controller@sgasystems.co.uk