

# UK Data Protection Act 2018 & GDPR Compliance Policy

(Document Genetics is a division of Extra Resource Ltd, UK Company No. 03715580)

## 1. Scope

During the normal course of our activities as an Author, Supplier, Designer, Developer and Maintainer of Business Software Systems, it is possible that Document Genetics (DG) may become privy to personal data. Whilst this does not automatically define DG as a Data Processor, certain requests by you (Client) may temporally define us as a Data Processor, therefore, all activities undertaken are carried out as per this UK Data Protection Act 2018 & GDPR compliance policy.

High levels of data protection and security is always of paramount importance to DG and we are committed to meeting the requirements of a data processor relating to the personal data entrusted to us by our Clients. Full details of our Data Protection Policy can be found here:

<https://www.document-genetics.co.uk/Document-Genetics-Data-Protection-Policy>

## 2. Purpose of processing

It may be necessary to process personal data to enable us to provide ongoing support and service in which we demonstrate, design, test, benchmark and maintain software & services supplied to the Client by DG. It may also be necessary to access your business system remotely (with your permission).

## 3. Data processors

Data is processed under instructions of the Client and with the understanding that the Client is authorised to permit DG to process said personal data. We will only hold personal data for the duration of the project.

Data may be processed by any appropriate director or employee of DG who is contractually committed to confidentiality, but only when it is necessary to do so. Sub-processors will only be engaged with permission of the Client.

DG will report to the Client without undue delay on becoming aware of a personal data breach and cooperate with Client to resolve such issue. Additionally, DG will assist the Client in meeting obligations regarding allowing data subjects to exercise their rights.

## 4. Lawful bases for processing

The Client is responsible to ensure legal grounds for processing of any personal data processed by DG.

## 5. Transfers to third countries

We operate all our software and services from and in the UK. If data is stored on our servers or via our cloud services provider, all data will be stored in the UK. We do not transfer data to third countries.

## 6. Organisational and technical compliance & security measures

Personal Data will always be held on encrypted devices and may be transported on encrypted portable electronic equipment. Any data stored on servers via our services providers will be in an environment covered by ISO 27001/9001/2000 certification and based in the United Kingdom.

## 7. Variations to this policy

Should the Client require any variation to this Policy, the Client must provide DG with a Data Processing Agreement along with their detailed requirements, to which we will respond and provide consequential effects to the project and costings.

**Our data protection registration number is: Z8972300.**

