



Huis Technologies Privacy & GDPR Policy

Date: 15th October 2024

Review date: 31st October 2027

1. Purpose & scope

This policy outlines how Huis Technologies Ltd complies with the General Data Protection Regulation (GDPR) and protects the personal data of our customers, employees, and other stakeholders. This policy applies to all employees, contractors, and third-party service providers who handle personal data on behalf of Huis Technologies Ltd.

This policy is reviewed and updated annually and when changes to our practice are made. Policy updates are reviewed and implemented by the Managing Director and Technical Director. Dates for the next planned review are detailed at the top of this policy.

Data is processed and stored by Huis Technologies Ltd in the UK and Republic of Ireland.

2. Our contact details

Name of Data Controller:
Alexandra Gray

Business Address:
Huis Technologies
42 Cheslea Rd
Southsea
Hampshire
UK, PO5 1NJ

E-mail:
support@huistechnologies.com

3. Types of information included in the scope of this policy

Information classification	Sensitivity of information & access controls
Public: Information that is intended for public consumption.	No confidentiality concerns, and its disclosure does not harm the organisation or its stakeholders.
Internal Use Only: Information meant for internal use within the organisation.	Access is restricted to employees and authorised personnel.
Confidential: Sensitive information that, if disclosed, could harm the organisation or its stakeholders.	Access is limited to individuals with a specific need-to-know (directors only).
Restricted: Highly sensitive data requiring strict access controls.	Access is restricted to a specific group of individuals, typically on a need-to-know basis. Safeguarding information is classified in this way, for example. Access to safeguarding information has mandatory MFA.
Personal Identifiable Information: Information that can be used to identify an individual. Examples include names, dates of birth, addresses, and contact details.	Subject to access controls due to the potential risk of identity theft as well as the potential harm caused by making personal information public. Password protected in all systems. MFA on request.
Financial information: Information related to financial transactions, account details, and payment card information.	Subject to strict security measures due to the risk of financial fraud. No financial details are held directly by Huis Technologies. We do not process payments. Our own financial information (invoicing etc) is password protected via Xero.
Health information: Sensitive personal health information held by organisations who collect and/or store data on behalf of the NHS or private healthcare. Includes medical records, patient information, and health-related data.	Health records kept for medical reasons by other organisations (such as education and social care). Password protected documentation held securely on a cloud-based platform. Access to health information has mandatory MFA.
Proprietary information / intellectual property: Information critical to the organisation's competitiveness. Includes trade secrets, proprietary algorithms, and intellectual property.	Information highly sensitive to the organisation (ourselves or our customer) is kept on a separate internal system and can only be accessed by Huis Technologies employees with sufficient permissions.

Legal/compliance information: Data subject to specific legal or compliance requirements. Includes contracts, legal documents, and compliance-related records.	Often considered highly sensitive due to its strategic importance. Password protected and held securely on a cloud-based platform.
Research and development: Information related to ongoing research, development, or innovation.	Often considered highly sensitive due to its strategic importance. Password protected and held securely on a cloud-based platform.
Customer/ client information: Information about customers, including preferences, purchase history, and communication records.	Requires protection due to privacy and trust considerations. Password protected and held securely on a cloud-based platform.
Unclassified information: Data that doesn't fit into specific classified categories	Still subject to general security practices but may not have stringent controls.

4. The type of personal information Huis Technologies Ltd collects directly includes

4.1 Personal identifiers and contact information [customer/client data].

4.2 General information about customers' own service users (cohort size, school location, and type) linked to the process of developing a quote [customer/client data].

4.3 Financial information linked only to our invoicing and billing system (Xero) [financial information].

4.4 Information about customer-specific developments related to our technology and/or customer' internal processes that may be commercially sensitive [proprietary information/ intellectual property].

5. The type of personal information Huis Technologies Ltd processes on behalf of our users/customers, but that we do not directly collect, includes

5.1 Personal identifiers, contacts and characteristics (for example, name, address, date of birth, telephone and email and contact details) [personal identifiable data].

5.2 Academic progress information relating to our user's/customers' own service users (including attendance, behaviour and school reports) [personal identifiable data & internal use only].

5.3 Sensitive personal information about our users'/customers' own service users (for example, safeguarding information, medical information, information about referrals to other services etc) [confidential information & health information].

5.4 Copies of files including personal documents containing personally identifiable information such as names, addresses and dates of birth [personal identifiable data].

6. How we collect personal information and why we have it

6.1 Most of the personal information we collect is provided to us directly for one of the following reasons:

- You are a customer of Huis Technologies or a user of our software services
- You are seeking to commission our services
- You are an employee of Huis Technologies Ltd

6.2 We also receive personal information indirectly, from the following sources in the following scenarios:

- You are an employee of a customer of Huis Technologies and are a user of one of our cloud-based systems
- You are a nominated person asked by one of our customers to provide us with your information so that you can access their system

6.3 We use the information that you have given us in order to:

- Help you and/or your employer to see who has accessed the systems upon which they rely
- Ensure that you have access to the system(s) you/ your employer are using
- Make contact with you if there has been a system fault
- Make contact with you for the purposes of training and support

6.4 We may share this information with:

- Your organisation
- Other organisations where appropriate (for example if we are asked to assist in an investigation by policing or criminal justice agencies)

7. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for collecting this information are

(a) Your consent.

You are able to remove your consent at any time. You can do this by contacting our Data Controller, Alexandra Gray, via alex@huistechnologies.com.

(b) We have a contractual obligation.

8. How we process personal information and why we have it

8.1 The personal information we process is provided to us indirectly by our users/customers, who collect it and require access to it for the purposes of their work. Ordinarily, the basis

upon which our users/customers collect the information is that they have a legal and/or contractual obligation or to perform a public task.

8.2 Our customers are required to operate under the processes set out in their own GDPR Policy and/or Privacy Policy which will outline the basis upon which they will collect, store and process personal information using our systems. This requirement is set out in the terms of our customer's Service Level Agreement (SLA) or Software Application License Agreement with us.

8.3 We may process your information if:

- You are a current or previous service-user involved with an organisation who uses one of our systems (your/your child's school for example)
- You are a family member or personal relation of a service-user involved with an organisation who uses one of our systems
- You are an external agency working with a service-user involved with an organisation who uses one of our systems

8.4 We do not directly share personal information provided to our users/customers. We process and store this information on their behalf. We will not share personal information on our customer's service-users for any reason unless we are legally required to do so.

8.5 We will use anonymised data for the purposes of research into and development of our systems. This data will not contain any personal information or anything that might make it personally identifiable.

8.6 Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent.

You are able to remove your consent at any time. You can do this by contacting our Data Controller, Alexandra Gray, via alex@huistechnologies.com.

(b) We have a contractual obligation.

9. How we store your personal information

9.1 Your information is securely stored. We keep personal information on users/customers (such as contact details) for the period of time during which the user/customer is actively using our system and for no more than 36 months after this.

9.2 When a user ceases to work for an employer who is one of our customer's, the user's login (containing name and email information) will be deleted immediately.

9.3 When a customer gives us notice of their intention to terminate use of our system, we provide the data they have collected (including all personal information) as a secure, password-protected digital export within 30 days of termination. At this point, we destroy all

personal data that has been collected and stored, removing it from our system. Responsibility for ensuring the data remains secure passes to the customer at this point. This is covered under our customer's own GDPR processes and policies.

9.4 If you are a service-user who has had contact with one of our customers, your data is collected and stored by our customer and not by us. You will need to direct any request for this information to our customer in the first instance. Our customer is responsible for ensuring that personal information is destroyed after it is no longer needed for the purpose for which it was collected.

10. Your data protection rights as an employee, user or customer of Huis Technologies

Under data protection law, you have rights including:

1. Your right of access - You have the right to ask us for copies of your personal information.
2. Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
3. Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances (for example you have stopped working for one of our customers and wish your name and email to be removed from our database).
4. Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
5. Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
6. Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at alex@huistechnologies.com if you wish to make a request.

11. Your data protection rights as a service-user of a customer of Huis Technologies

Under data protection law, you have rights including:

1. Your right of access - You have the right to ask our customer for copies of your personal information.
2. Your right to rectification - You have the right to ask our customer to rectify personal information you think is inaccurate. You also have the right to ask them to complete information you think is incomplete.

3. Your right to erasure - You have the right to ask our customer to erase your personal information in certain circumstances.

4. Your right to restriction of processing - You have the right to ask our customer to restrict the processing of your personal information in certain circumstances.

5. Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances. This will depend on whether the processing of your data by our customer is covered under lawful bases.

6. Your right to data portability - You have the right to ask that our customer transfer the personal information you gave them to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, our customer has one month to respond to you. You will need to contact our customer directly to make the request.

11. Identification, tracking, and destruction of personal data associated with an individual

Data associated with an individual is directly collected by Huis Technologies Ltd in the circumstances outlined in section 6. This data is destroyed once there is no longer an active customer/user relationship. An audit of customer data takes place quarterly; old correspondence and documents are destroyed where appropriate. The audit is overseen by the Managing Director and a record of each audit is kept.

Data collected on behalf of a customer of Huis Technologies Ltd, using our software, must be kept by the customer only for the statutory timescale appropriate to the type of data in line with our customer's own GDPR policy. We operate an automated alert system which identifies potential non-compliance, where it is possible that a customer of Huis Technologies Ltd has retained data associated with an individual beyond the recommended timescales for the type of information. Automatic alerts are based on maximum statutory limits for retaining data associated with an individual. Once an automatic alert has been raised, we will contact customers directly and request that they investigate and destroy data where appropriate.

12. How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at alex@huistechnologies.com or:

The Data Controller
203 West St
Fareham
PO16 0EN

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>