

GDPR Statement

The European Union has taken steps to protect the fundamental right to privacy for every EU resident with the General Data Protection Regulation (GDPR) which will be effective from May 25, 2018. Simply put, EU residents will now have greater say over what, how, why, where, and when their personal data is used, processed, or disposed. This rule clarifies how the EU personal data laws apply even beyond the borders of the EU. Any organisation that works with EU residents' personal data in any manner, irrespective of location, has obligations to protect the data. Business Software Group is well aware of its role in providing the right tools and processes to support its users and customers meet their GDPR mandates.

Business Software Group has been developing global enterprise software for over 25 years, delivering secure, robust, scalable and deeply customizable database automation solutions for our global customer base, both onsite and using cloud technology.

Our engineering teams offer decades of expertise in the development and maintenance of desktop, browser and mobile software solutions, together with the associated server and storage infrastructures, all fully designed and maintained according to industry-standard security principles.

Security is a continuous practice at Business Software Group. Our commitment to using industry-standard solutions and proven methodologies to assist with the streamlining of your business processes through technology.



Our Cloud Platform	Flexiva runs as a cloud service on the Amazon AWS infrastructure, a <u>Leader in the Gartner Magic Quadrant for 7 consecutive years.</u> Amazon the global leader in cloud computing services, having achieved dozens of industry-standard security certifications including <u>ISO 27001</u> . By using Amazon as our hosting services, we are enabling our customers to benefit from best in class infrastructure availability and security. For more information please visit the Amazon GDPR Center <u>here</u> .
Service Availability & Data Restoration	The rules of GDPR are as applicable to disaster recovery systems as they are to production systems. Our internal CRM database and our customers' cloud hosted databases are stored within the Amazon EU cloud service infrastructure, where we are technically able to quickly restore service operations in the event of an incident, by taking advantage of a highly available cloud infrastructure which uses modern virtualisation technologies and fully automated capacity management functionality. For over 10 years, Flexiva has been developing automation functionalities in partnership with the Amazon cloud, leading to the highest levels of service uptime for our cloud hosted customers. We are able to offer industry-standard Recovery Point Objective (RPO) and Recovery Time Objective (RTO).
Our Database Technology	The Flexiva CRM database model is based on industry-standard Microsoft SQL Server technology, a <u>Leader in the Gartner Magic Quadrant</u> . Our specialist database team offers decades' worth of senior-level database administration know-how, from design to implementation and maintenance, ensuring your Flexiva database offers the highest levels of performance and security.
Security by Design and by Default	We employ fundamental principles of modularity, separating systems and services using system and network configurations according to industry-standard practices. In addition, our teams are fully aware of the fundamental principles of information security, receiving ongoing training, ensuring the privacy, confidentiality and security of your data. All our systems and servers are secured through a multi-layered defense solution, comprising firewalls, VLAN routing, password protections, dual factor authentication, operating system maintenance, patching, updating, antivirus, active directory group policy, system logging, secure remote management using VPN and IP address restrictions as well as physical layer security mechanisms, continuous staff device security monitoring and staff security awareness training. We use SSL and/or TLS on all browser-based communications and secure password authentication on all services. All technical support activity completed on customers' servers (Flexiva onsite installations) is carried out using secure remote access technology, where the connection mechanism and connection restrictions are defined by your organisations' IT policy.
Privacy First	We do not sell or provide your data to third parties, other than where the third party is a data processor / sub-processor fundamental to the delivery of our services to you (for example our cloud hosting provider or our invoicing service provider). In addition we do not provide any sensitive information to your end users/consultants should they contact us and such contact be of a nature where only designated customer account maintainer contacts can either authorise or deny such requests. This further ensures privacy of data for which you are the Data Controller.
Unrivaled Technological Expertise	Our extensive customer base is using the most advanced technology available to recruitment organisations, including Application Programming Interfaces (API) deployed behind the corporate firewall, secure online portals and mobile apps, granular security controls for end users and much more.



Data, Data Controllers, Data Processors, Data Sub-Processors

Your own personally identifiable data stored on our internal systems (CRM & Helpdesk Systems)

Our internal customer CRM and Helpdesk systems operate within the Amazon AWS Dublin cloud datacenter facility (except where otherwise stated or required, for example in the event of a disaster recovery scenario). This is where we hold your contact information as a customer, registered on our CRM database.

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Data Controller	Business Software Group
Data Processor	Business Software Group
	(sales, marketing, technical support, data migrations, software development, maintenance & testing)
	Location: Cambridge, United Kingdom
Data Sub-Processors	Amazon Services Europe - Cloud Services
	Location: European Union (Dublin, Ireland)
	Xero - Invoicing Services
	Location: New Zealand
	Google LLC - Gmail Communications
	Location: Global
	Google LLC - Document Collaboration
	Location: Global
	Google LLC – Google Analytics
	Location: Global
	Microsoft Corporation – Skype
	Location: Global
	Microsoft Corporation – E-Mail Communications, Microsoft Teams Collaboration, File Storage
	Location: Global
	Byteplant GmbH – Email address validation
	Location: Germany
	LogicMelon – Job Board Multi Posting
	Location: United Kingdom
	Broadbean – Job Board Multi Posting
	Location: United Kingdom
	Idibu – Job Board Multi Posting
	Location: United Kingdom
	RingCentral – Telephony, Screen Sharing, Conference Calling, Screen Sharing Assistance
	Location: United Kingdom
	24x – SMS Text Messaging
	Location: United Kingdom
	Zapier – Integrations Platform
	Location: Global
	GoCardless – Payments Platform
	Location: Global

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Additional Information:

Business Software Group is not responsible for 3rd party services

Please remember that Business Software Group acts only as a data processor. You are required to have your own procedures in place to make sure you are GDPR compliant and to manage and use your data and services appropriately. Usernames and passwords must be treated with the utmost care as a lost or stolen password can lead to serious security vulnerabilities. Please ensure your passwords are changed on a regular basis via: https://flexiva.co.uk/support (use the "Edit Profile" menu). All devices accessing services provided by Business Software Group should be patched to the latest versions of their operating systems and should have up to date anti-virus and firewall protection.

We are not responsible for misuse of the system and strongly encourage regular reviews of user database security permissions (managed through the "Administrator Console" in your Flexiva database) to make sure that only strictly authorised staff have access to security sensitive features, functions and data. Please contact your Flexiva service administrator for additional information. If you have any additional queries please contact support@Flexiva.co.uk or visit www.Flexiva.co.uk and get in touch.

Contacting Us

If you have questions or complaints regarding this Policy, please contact our data protection team using the following e-mail address: support@flexiva.co.uk.

You may also write to us. Please visit www.flexiva.co.uik for additional contact information or write to us using our office address available on our website.