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 organization 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.

As your partner, we want to help you make your process as seamless as possible so that you don't have to worry about compliance and can focus more on running your business, which is why we aim to have the industry's most comprehensively automated GDPR workflow management solution, fully integrated with your database.

Business Software Group has been developing global enterprise software for over 25 years, delivering secure, robust, scalable and deeply customizable recruitment agency 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	The Business Software Group cloud platform/software as a service runs on the Amazon AWS infrastructure, a **Leader in the Gartner Magic Quadrant for 7 consecutive years.** Amazon the global leader in cloud computing services, having achieved dozens of industry-standard security certifications including ISO 27001. 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 here.
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 virtualization technologies and fully automated capacity management functionality. For over 10 years, Business Software Group have 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 Business Software Group CRM database model is based on industry-standard Microsoft SQL Server technology, a **Leader in the Gartner Magic Quadrant.** Our specialist database team offers decades' worth of senior-level database administration know-how, from design to implementation and maintenance, ensuring your Business Software Group 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 (Business Software Group 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.	
Data Controller	**Business Software Group Ltd.**
Data Processor	**Business Software Group Ltd.** (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 **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 **Nylas – Email, Diary and Contact Synchronisation** Location: United Kingdom **Zapier – Integrations Platform** Location: Global **GoCardless – Payments Platform** Location: Global

Your data and your database running on our servers (Full Cloud)

Your Business Software Group cloud database and Business Software Group cloud data drive (which hold your recruitment data) are both hosted within the Amazon AWS Dublin cloud datacenter facility (except otherwise requested, stated or required - for example in the event of a disaster recovery scenario). Our team performs highly specific secure technical support activities in the context of your recruitment database/data.

Please note your database and data drive are backed up daily and retained for 30 days. This means you may request a restoration of a backup completed in the previous 30 days, on the assumption that you are an active Business Software Group Customer and the authorised point of contact.

Data Controller	**Business Software Group Ltd.**
Data Processor	**Business Software Group Ltd.** (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 **Byteplant GmbH – Email address validation (where you may have this service enabled)** Location: Germany **Daxtra Technologies Ltd** Location: United Kindgom **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 **Nylas – Email, Diary and Contact Synchronisation** Location: United Kingdom **Zapier – Integrations Platform** Location: Global **GoCardless – Payments Platform** Location: Global

Your data and your database running on your servers with the API service running on our cloud service (Hybrid Onsite/Cloud)
Your onsite Business Software Group installation where you store your recruitment data may be connected to our online API service, which is stored within the Amazon cloud infrastructure. Our API service acts as a bridge between your database and your website/online portals, your Business Software Group mobile app(s) and other services connected to the API, with our team performing highly specific secure technical support activities on your Business Software Group installation, related to support tickets raised on our helpdesk system.

Data Controller	**Your Organisation**
Data Processor	**Your Organisation** **Business Software Group Ltd.** (sales, marketing, technical support, data migrations, software development, maintenance & testing) Location: Cambridge, United Kingdom
Data Sub-Processors	**Amazon Services Europe - Cloud API Service** 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 **Byteplant GmbH – Email address** Location: Germany **Daxtra Technologies Ltd** Location: United Kindgom **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 **Nylas – Email, Diary and Contact Synchronisation** Location: United Kingdom **Zapier – Integrations Platform** Location: Global **GoCardless – Payments Platform** Location: Global

Your data and your database running on your servers, possibly also including a full onsite API installation running on your servers (Full Onsite)	
Your onsite Business Software Group installation where you store your recruitment data (and where applicable your full onsite Business Software Group API deployment, which acts as a bridge between your database and your website/online portals, your Business Software Group mobile app(s) and other services connected to the API) is/are managed by your IT support team, with our team securely performing highly specific technical support activities on your Business Software Group installation, related to support tickets raised on our helpdesk system.	
Data Controller	**Business Software Group Ltd.**
Data Processor	**Business Software Group Ltd.** (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 **Byteplant GmbH – Email address validation** Location: Germany **Daxtra Technologies Ltd** Location: United Kindgom **LogicMelon – Job Board Multi Posting** Location: United Kingdom **Idibu – Job Board Multi Posting** Location: United Kingdom **Broadbean – 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 **Nylas – Email, Diary and Contact Synchronisation** Location: United Kingdom **Zapier – Integrations Platform** Location: Global **GoCardless – Payments Platform** Location: Global

Additional Information

- Business Software Group is not responsible for 3rd party services such as CV Parsing services, Test Messaging Services, Job Posting services, mass-mailing services and other services where personally identifiable data relating to your clients and candidates may be processed, for the purpose of the service provided.

- Some areas of The Business Software Group Platform use Amazon SES (Simple Email Service) to request e-mail message delivery. For this reason, when you generate mass mails using the Marketing Campaign Module, e-mail messages containing personally identifiable information (mail merge fields) will be processed by the Amazon SES service, where our current configuration specifies that we only send these e-mails though the Amazon SES Ireland service, therefore this processor is located within the EU.

- When you use the Business Software Group mass-mailing service, depending on the rate of undeliverable/bounced e-mails and depending on the rate of e-mails flagged as spam by the recipients or the recipients' spam filters, your e-mails may stop being delivered due to the real-time nature of spam lists worldwide. In such cases, Business Software Group is not responsible for the removal of your e-mail addresses or e-mail domain from spam blacklists and may decide to block further use of the mass mail service until you review your e-mailing policies and determine the reason why the bounce / spam rate is high to the point of resulting in blacklisting.

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://support.trisys.co.uk (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 Business Software Group database) to make sure that only strictly authorised staff have access to security sensitive features, functions and data. Please contact your Business Software Group database administrator for additional information. If you have any additional queries please contact support@trisys.co.uk or visit www.trisys.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: privacy@trisys.co.uk

You may also write to us. Please visit www.business-software.group for additional contact information or write to us using our office address available on our website.