

Data Protection Policy

Ancrum Software Limited

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Date of Next Review: December 2025

1. Introduction

1. ANCRUM SOFTWARE LIMITED (“ANCRUM”, “we”, “us”, “our”) is a limited company registered with Companies House set up to deliver software solutions and consultancy.
2. The UK General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (together referred to as “Data Protection Legislation”) regulate the processing of personal data and protect the rights of the data subject.
3. As ANCRUM SOFTWARE LIMITED processes personal data, we are registered as a data controller (Registration Number ZB638066) with the Information Commissioner’s Office (“ICO”), which means we are responsible for deciding how we hold and use personal data.
4. Data Protection Legislation imposes restrictions on how we obtain, handle, store, destroy and process personal data.

2. Legal Basis

1. We must have a legal basis to process your personal data. Our legal basis is under Article 6(1)(a): ‘the data subject has given consent to the processing of their personal data for one or more specific purposes’ and Article 6(1)(b): ‘processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract’.
2. We consider your consent to be given during the signing of the contract we send to you.
3. Should you wish to withdraw your consent, it will result in the contract being terminated as we will no longer be able to comply with the regulations outlined above.

3. Scope

1. This Policy applies to all data subjects in relation to whom ANCRUM holds or has received personal data in order to carry out ANCRUM functions.

4. Purpose

1. We collect data to facilitate the delivery and functionality of our software services. This includes user authentication, storing sensitive files and communication.
2. Aggregated and anonymised data may be utilised for analytics and improvement purposes. This assists in enhancing our software, tailoring it to meet the specific needs of our customers, and improving overall user experience.
3. It is our commitment to ensure that data collection is carried out transparently, and individuals are informed of the purposes for which their data is being collected and used.
4. We will not use personal data for purposes incompatible with those outlined unless we obtain explicit consent or are legally obligated to do so.

5. Data Collection

1. Personal data collected such as names, email addresses and passwords will only be used for specified and legitimate purposes as outlined in our privacy policy. We will ensure that all data collection is lawful, fair and transparent.
2. Sensitive information related to children, including but not limited to educational records and any other personally identifiable information, will be handled with the utmost care and in compliance with applicable laws and guidelines.

6. Data Transfer

1. We maintain data security by protecting the confidentiality of your personal data through 'encryption-in-transit'. This ensures that if intercepted by a malicious actor, they will be unable to view the content.

2. Data is currently only moved within the UK. However, if a situation emerges where transferring data outside of the UK is beneficial or requested, then we will apply the following conditions:
 1. The country to which your Personal Data will be transferred to must have an equal or better level of data protection which is enforced by legislation
 2. You have provided explicit consent for your Personal Data to be transferred
 3. The transfer of your Personal Data is required by law

7. Data Storage and Retention

1. Data related to, and uploaded to on any web platform will be stored in Amazon Web Service's infrastructure in UK regions.
2. Personal Data will only be retained for as long as necessary to fulfil the purposes for which it was collected, or as required by law. After this period, data will be securely deleted or anonymised.
3. Upon the termination of contract with ANCRUM, all data will be irrevocably deleted within 5 working days.

8. Security Measures

1. ANCRUM will implement appropriate technical and organisational measures to protect personal data from unauthorised access, disclosure, alteration, and destruction.
2. Access to personal data will be limited to authorised personnel on a need-to-know basis. All employees will undergo regular training on data protection best practices and security protocols.
3. Encryption, pseudonymisation, and anonymisation techniques will be employed to enhance data security where applicable.
4. ANCRUM will incorporate privacy and data protection considerations into the design and development of software and systems to ensure data protection is an integral part of our operations.

9. Third Party Relationships

1. Any third-party vendors or partners involved in processing personal data on behalf of ANCRUM will be selected carefully and required to adhere to similar data protection standards as outlined in this policy.
2. Current software providers we use to process data is: Amazon Web Services, IONOS and Google. These are all GDPR compliant and adhere to the following privacy policies:
Amazon Web Services: <https://aws.amazon.com/privacy/>
IONOS: <https://www.ionos-group.com/privacy-policy>
Google: <https://cloud.google.com/privacy/gdpr>

10. Breach Response

1. In the event of a data breach involving personal data, ANCRUM will promptly assess the situation, take appropriate steps to mitigate risks, and notify affected individuals and relevant authorities as required by law.

11. Your Rights

1. Right to access – you have the right to request any data we hold related to you, or the business you represent. This will be provided to you on request, free of charge.
2. Right to rectification – if the data we hold is inaccurate or incomplete, you have the right to have your data rectified. Please contact the Data Protection Officer in this scenario.
3. Right to erasure – you have the right to request the deletion of personal data if the purposes for which they were collected are no longer required, or collected unlawfully.
4. Right to restriction – you can request that we restrict the processing of your data amid a dispute concerning the accuracy of the data we hold, if the collection is unlawful (but you do not wish for it to be deleted), or you require us to hold data we would otherwise delete in line with policy for the exercise or defence of legal claims.
5. Right to object – you have the right to object to the processing of personal data. We would then no longer process your personal data unless we can provide legitimate

grounds which override your interests, rights and freedoms such as the exercise or defence of legal claims.

6. Right to data portability – you have the right to obtain personal data related to you in a structured, and readable format. This must be provided to you within one month.
7. Right to withdraw – you have right to withdraw content to future processing.
8. Right to complain – you have the right to contact a suitable authority if you believe the processing of data belonging to you, or the business you represent, has violated GDPR.

12. Review and Update

1. This Data Protection Policy will be regularly reviewed and updated to ensure its relevance and effectiveness in safeguarding personal data and sensitive information.
2. Where appropriate, we will notify you of any changes by email.

Version	Date	Brief Details of Change
1.0	20 December 2023	Privacy Notice Created
1.0.1	19 December 2024	Reviewed, branding update

13. Contact Details

1. Our registered Data Protection Officer is Ciarán Carr who can be contacted below:

Address: 2 Oaklands, Low Street, Oakley, Diss, IP21 4AQ

Email: ciaran@ancrumsoftware.com

Phone: 07736 807000

14. Declaration

By adhering to this Data Protection Policy, ANCRUM SOFTWARE LIMITED ensures the security, confidentiality, and responsible handling of personal data, especially sensitive information related to children, in alignment with legal requirements and best practices.

Signed on behalf of Ancrum Software Limited



CIARÁN CARR

Director, Ancrum Software Limited

Dated 20/12/2023