



CASEWARE

GDPR
CaseWare UK Ltd
Compliance Statement

March 2019

LAWFUL BASIS FOR PROCESSING

CaseWare UK Limited has a lawful basis for processing personal data based on the need for us to fulfil our contractual obligations to you as a user of our software and services, and on the basis of consent in order to continue to inform our customers, and potential customers of additional services and enhancements directly related to those products and services.

CaseWare UK is compliant with the requirements of GDPR.

STATEMENT

CaseWare UK Limited is aware of its responsibilities under GDPR, the effective date of which was May 25th 2018.

The management of CaseWare UK are fully aware of the requirements of GDPR and are engaged in a full review of all of our systems and third-party providers to ensure that we comply with the requirements, and remain so beyond the effective date.

We remain registered with the Information Commissioner and comply with current regulations, under reference Z9140757.

- The management of CaseWare UK are fully aware of the GDPR process, and kept continually informed of the GDPR requirements and process.
- Under GDPR CaseWare UK Limited is not required to appoint a specific Data Protection Officer as we do not meet the following categories
 - *We are not a public authority*
 - *We do not carry out large scale processing of special categories of data*
 - *We do not carry out large scale systematic monitoring of individuals*

However;

- We recognise our responsibilities under GDPR, and therefore all data security monitoring is embedded in the management cycle of the business as part of the CaseWare UK Operations Team responsibilities.

A comprehensive Data Security Policy has long been in place, and reviewed on a quarterly basis by the Operations Team. This has been updated to reflect GDPR

- The policy and the wider GDPR implications are reinforced through Induction training, and continual updates and awareness training for existing staff.
- The first specific GDPR update for all existing staff took place during January and February 2018.

RIGHTS UNDER GDPR

- With regards to individuals we recognise the following rights under GDPR;

- the right to be informed
 - the right of access
 - the right to rectification
 - the right to erasure
 - the right to restrict processing
 - the right to data portability
 - the right to object
 - the right not to be subject to automated decision-making including profiling
- We review the security status of third-party software providers, which is documented as part of the Data Security Policy and quarterly review.
 - We are confident that we comply with an individual's rights under GDPR, and will be removing all old information from any legacy systems to ensure that any future marketing data is held on an active consent basis from the effective date of GDPR.
 - We use a single marketing channel for all communications to clients, using an application that ensures compliance with the GDPR requirements for consent.
 - We use a separate database for managing support services and renewal contracts.
 - Our business does not involve contact with minors, nor does it store any information of any kind relating to minors.
 - There is a fully documented breach process as part of the comprehensive Data Security Policy.
 - When processing any form of client data we ensure that;
 - Fairly and lawfully processed
 - Processed for limited purposes
 - Adequate, relevant and not excessive
 - Accurate and kept up to date
 - Not kept for longer than necessary
 - Processed in accordance with the individual's rights
 - Secure

OTHER AVAILABLE DOCUMENTS

How we use your data

A 'How we use your data' document is available on via the CaseWare Knowledge Base, and provides a clear explanation of what data we process and what purpose we use that data for. As stated above we recognise the right of any individual to have their details removed from our systems at any time.

Data Security Policy

A current version of the Data Security Policy for the business is available to clients on request. This is continually under review and subject to amendment depending on changes made to our security environment. The current version is dated March 2019.

CURRENT WORK

We have made additional changes to our IT infrastructure as part of the principle of 'Protection by Design', including full 2-factor authentication for access to all CWUK systems.

CASEWARE CLOUD & CASEWARE INTERNATIONAL

The relationship between UK customers and CaseWare Cloud Limited is independent of CaseWare UK Limited, and covered by separate CaseWare Cloud Services and CaseWare Data Processing Agreements.

These are being updated by CaseWare International in advance of the GDPR deadline and users will be requested to accept the revised terms, via their CaseWare Cloud login screen, once they have been released