

# How we use your data

*GDPR & Caseware UK Limited*

*Revised: May 2022*

## 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 of additional services and enhancements directly related to those products and services.

## How we use your data

Caseware UK Limited conduct regular reviews of its data protection and handling policies and procedures. In the light of the General Data Protection Regulations we have decided to make our data processing more transparent so that our customers understand what happens to their information within Caseware UK Limited.

Caseware UK Limited provides a range of services and applications, and has a business need to meet its contractual obligations to clients and to market future products and services. Our primary control over how we use your data is the separation of service and marketing systems, to ensure we do not process data unnecessarily or for the wrong purpose.

The internal handling of all data is governed by our Data Security Policy, and GDPR is managed by the Caseware UK Limited Operations Committee who act as the Data Protection Officer for the business.

### Caseware CRM

Caseware's CRM system is used to store full licensing and contact details for all of our contracted customers, the primary contacts within customer businesses and users who contact the telephone, online chat or email support services.

Therefore in addition to licensing information we record address details, emails and telephone numbers of those users. Telephone numbers will be a main office contact number, a direct line number or if provided by a user, a mobile number. The gender of a contact could be inferred from the title they use, but Caseware UK Limited does not profile any form of data on the basis of gender.

We do not store any personal address information unless this incidentally happens to be the customer's place of business.

A user's name, telephone number and email information is retained as a part of the record of the support query, and to facilitate future conversations. This information is retained as part of the history of our contact with your business.

As part of our renewal notification process we provide primary contacts within your business the details of every individual's data that we hold in order to make sure that our information is accurate and current. This has been in place for over two years and is the most transparent and effective way for us to show you what data we hold, and for you to inform us of any changes.

### Profiling of data

- We profile users by role or function, in order to ensure that the correct service and support information, and software, is delivered to the right people within your business.
- We profile customers by geographical region in order to manage the allocation of clients to account managers, and to manage user groups, conference invitations and similar regional events.
- We carry out other analysis of licence and support call data for the purposes of internal business management, and service improvement.
- We use these contact details to invite users to attend support webinars, online training sessions.
- We do not profile data for any other purpose, or on any other basis.

## Caseware Marketing

Minimal contact details (name, and email address) of contacts are passed to the Caseware Marketing system in order to more effectively manage other client communications, relating to the marketing of products, services and events to existing customers.

Contacts have the ability at any time to unsubscribe from this service, either via the content of any marketing communication (automated unsubscribe) or by contacting Caseware UK Limited directly. We therefore recognise your rights as an individual under GDPR.

## Other systems and services

### Online Training

Our online training courses are by SAP Litmos Learning Management System and are hosted on Callidus Software Inc. The only data items retained are a user's name, surname, email and their business/company name. These are retained to enable us to deliver an electronic certificate to those completing the courses for CPD purposes.

Feedback forms are used in our training classroom environment. The data from these forms is retained for internal staff performance monitoring and for handling short-term queries from clients. Names and email addresses are passed to the Caseware CRM in order to make support call management more efficient.

### Caseware training and implementation services

Caseware UK Limited adopts Caseware Cloud as the management tool for managing client training services, on-boarding, consulting and special products. This data is not used for any other purpose.

This tool is adopted to ensure a higher level of data security surrounding information that will be shared between our consulting teams and clients, and using the integrated online portal removes all risks associated with the transfer of information by email.

Caseware Cloud is hosted by Amazon Web Services, with all data held (and backed up) within the EU region.

Caseware International Inc. is ISO certified and Amazon Web Services are GDPR compliant.

## Caseware Knowledge Base

The Caseware Knowledge Base is the self-service support and information tool available only to Caseware UK Limited customers. Only an individual's name, email and business name is stored.

Users self-register and therefore can un-register from this online support service. Occasionally a customer will ask us to register a list of users provided by themselves, which we regard as freely given consent to store that information.

Users register for specific information streams, updates and notifications via RSS feeds, and can unsubscribe at any time.

We monitor activity levels on the site for the purposes of service management and improvement.

## Webinar data

Customers and prospects opt-in to webinar sessions and have to provide a name, email and business name in order to confirm their registration.

Registered attendee details are passed to our marketing system in order to provide them with recordings of the sessions they attend. Any email they receive will include the option to then unsubscribe option from any future communication.

## Recording support calls

As a matter of policy we record telephone support calls, which is a vital training tool for any new members of staff that join the team. We also believe it provides a short-term archive that could assist both ourselves and our clients with any dispute resolution or mediation. Callers are informed of the recording of calls via the telephone menu system, and we will respect the right of any caller who requests that we do not record any given conversation.

## Other points of note

### Third parties

We do not provide any customer or prospect details to any third parties for commercial or non-commercial purposes.

We do not provide any customer or prospect details to business partners, or consultants other than those involved directly in specific client projects, & only then when governed by the appropriate mutual non-disclosure agreements.

We don't provide any customer or prospect details to any other Caseware organisation, with the following exceptions;

- With Caseware International Inc. (see below)
- Where there is a common client or prospect that is investigating, trialling or implementing Caseware in a territory outside the UK. This information is limited to name and the email address of parties connected with the specific project, and only provided after receiving consent from those individuals.

## Individual rights

We recognise an individual's right;

- To have access to their data on request, which will be provided within 30 days of receiving such a request. This will be free of charge unless the work involved is regarded as unreasonable
- To have explained the purposes of any profiling we may perform on your data
- To request a rectification of data errors or to erase the personal data
- To have explained when and why data is shared internationally
- To lodge a complaint to a supervisory authority

## GDPR compliance of third-party software tools

Caseware UK Limited adopts a number of software applications that enable us to operate our business effectively and provide efficient services to clients. These applications are checked for GDPR compliance to ensure that our supply chain is compliant. Details of those third party applications are provided as part of our data security policy, and are reviewed as part of our general data security process.

## Deletion requests

We will process any requests to delete information within 30 days, as required by GDPR. In the case of any conflict of opinion we will assume under the terms of the GDPR that consent has been withdrawn, remove personal data and therefore cease provision of the related services.

## Caseware Working Papers Data files

The Caseware development and support teams will receive, as part of their support service work copies of Caseware Working Paper engagement files. We have strict internal policies on the handling of this data, forming part of our wider Data Security Policy.

We will only accept data files via a secure file transfer portal, and not by email. Unsolicited emails containing such data will be replied to with a standard message explaining our policy in this regard.

Some organisations are permitted to email data to us but only if they acknowledge in writing, the risks and responsibilities for sending confidential information in this way. This acknowledgment will be retained within the Caseware CRM system.

## Caseware International Inc.

### Data provided to Caseware International Inc.

Caseware UK Limited is a wholly owned subsidiary of Caseware International Inc., and therefore there is a legitimate business interest on the part of Caseware International Inc. regarding any information critical to their running and understanding of the UK operation.

The data passed from the UK entity is as follows;

- Customer business name
- Licence numbers for all products purchased
- Licence value of all products purchased
- Geographical region
- Business categorisation by type and size (based on renewal revenue)

Caseware UK Limited does not transfer personal information outside of the European Economic Area other than with the consent of the relevant client.

Personal data may be held by Caseware International Inc. on UK clients, but only where this has been provided directly to them by the UK customer as part of a direct contractual agreement with Caseware Cloud Limited. This data is not processed by or controlled by Caseware UK Limited.

The relationship between UK customers and Caseware Cloud Limited is independent of Caseware UK Limited, and covered by the Caseware Cloud Limited Service Agreement and the Caseware International Inc. Data Processing Agreement.