

Our Role as a Data Processor

This document is part of our Data Protection Policy Portfolio.

Please refer to the Introduction document to provide a definition of terms, outline of policies and the context in which this policy is set.

Introduction

The Policies in this document relate to our role as a Data Processor

Definitions

Data Controller, Data Processor, Data Subject, Processing and Responsibility are all defined in “Our Definitions” document.

As a Data Controller

We control personal data about our customers, suppliers, employees etc. and we “**determine the purpose and means of processing**” of this data and have responsibility for it.

In relation to this data we are a Data Controller.

As a Data Processor

Where we process personal data for others, i.e. where we do not determine the “**purpose and means of processing**” of personal data to any extent that allows us control of it or have responsibility for it under the terms of GDPR.

In relation to this data we are a Data Processor.

If we process data about you

If you are the **Data Subject**, then any actions you wish to take regarding your data must be directed to the Data Controller as they control the data and not us.

If we process data for you.

If you are the **Data Controller** and we are the **Data Processor** and you direct us to process data for you then this will be deemed as a contract.

We undertake to fulfil our contract and process your data according to your direction and we acknowledge and accept our obligations to act in accordance with Article 28 of GDPR.

<https://gdpr-info.eu/art-28-gdpr/>

We will refer requests for information about a **Data Subject** to you and can process your data in using the methods you deem appropriate to ensure you comply with your legal obligations.

Unless otherwise stated, the data we process for you is **NOT** considered sensitive or special category data, if you require us to process sensitive or special category data, then please contact us.

We will implement reasonable and appropriate measures to ensure that processing and storage of your data remains within Union and member state legislation.

We will not retain the data beyond the duration required to fulfil our contract or as direct by you or unless required to do so by Union or Member State law.

We will not access or use the data except as necessary to provide the service to you.

We will not disclose the data to anyone else and implement reasonable and appropriate measures to prevent disclosure, unauthorised processing, accidental or unlawful loss and access to others unless directed to by Union or Member State law.

We will process the data as per your directions subject to Union and Member State law, and we will only determine the methodology and technology used to the extent that such a determination does not infringe on your role as the **Controller** and our role of the **Processor**.

Specifically, while we may determine the best system or practice to use during processing, we will make that choice based on efficiency of the process and not the nature of the data involved. If you assess that the processing of your data requires specific security methods, please direct us accordingly.