

## Managing client data in compliance with GDPR

### Data processing

Client data is processed in compliance with the General Data Protection Regulations (GDPR) and all relevant security legislation.

Client data is stored for the performance of a contract and within the timeframe of the contract/data agreement.

Client data is stored securely in MS Azure Cloud in the UK (London North and South).

Data is encrypted at rest in the database and during communication to user's browser.

### Control process

Data controls are managed as outlined in the organisation's Information Security Management System (ISMS) manual and Company Policies.

An annual audit of policies and procedures is conducted by a third party to ensure compliance as part of the organisation's ISO 27001 accreditation.

### Data retention

Client data is retained until the contract/data agreement with the client ends.

When the agreement timeframe expires, the client is advised of their data options.

### Data options

The following options and cost for each service can be provided, where available:

- **Read-only service** – single user access on read-only basis
- **Data export** – a one-time export as a set of csv files
- **Data retained** – a non-operational copy will be stored
- **Data extracts** – for retained data, extract report requests
- **Data archived** – data is archived without access
- **Data destruction** – client data is irretrievably destroyed and certificate issued

When stored client data exceeds its contracted timeframe - it will be destroyed within one month unless the contract is extended or renewed.

Date of Review: Dec 2025	Signed: <i>A Ellis</i>
Date of Next Review: Dec 2026	Print Name: Angela Ellis ISMS Manager