



MindaClient GDPR Compliance Document

All of our data is hosted within the EU and will never leave the jurisdiction of the EU.

The following outlines the systems MindaClient has implemented to ensure GDPR compliancy

Data Breach Response Plan

This plan outlines the steps MindaClient will take if there is a Data Breach.

Security Complaints Procedure

This procedure lays out the process a staff member must follow once they receive a complaint.

Data Breach Notification Template Form

There are two sections in this template, each having a number of questions that must be answered in the event of a Data Breach.

The timeframe for reporting and the address to be communicated with are included in this template.

Subject data breach notification

If the breach is likely to adversely affect the personal data or privacy of your subscribers or users, we need to notify them of the breach without unnecessary delay. This section outlines the steps and procedures we must follow.

Privacy Policy

We have re-written our Privacy Policy in accordance to take account of the GDPR requirements. This updated policy is available at the footer on our MindaClient website.

Appropriate technical & organisational security measures

We have documented the technical and security measures that we have put in place in order to comply with the GDPR requirements.

Accuracy

We have put in place procedures to ensure all personal data is kept up to date and accurate.

This involves Individual data checking and checking that can be carried out in bulk with new technology we have developed.

Data Minimisation

The policy of MindaClient is to ensure that the amount of personal data held by us is adequate, relevant and not excessive. The amount of personal data that we hold is limited to:

- Name of subject
- Telephone number of subject
- Mobile number of subject
- Email address
- Address
- Eir Code

Right to object to processing

The data subject has the right to object to processing based on certain criteria. In this section we outline the steps that we will take if a person objects to having their data processed. We have built in functionality into MindaClient to manage this process.

Right to halt processing

The data subject has the right to obtain from the controller restriction of processing where one of the following applies

- the accuracy of the personal data is contested
- the processing is unlawful
- the controller no longer needs the personal data for the purposes of the processing,
- the data subject has objected to processing pursuant to Article 21(1)

We have put procedures in place to manage this process to ensure that the request is dealt with in a timely fashion.

Right to restriction of processing

The data subject has the right to obtain for the controller restriction of processing where one of the following applies

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims
- the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

We have put procedures in place to manage this process, including reminders to ensure that the request is dealt with in a timely fashion.

The right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

We have put procedures in place to manage this process, including reminders to ensure that the request is dealt with in a timely fashion.

The right to erasure (right to be forgotten)

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- the data subject withdraws consent on which the processing is based
- the data subject objects to the processing pursuant to Article 21(1)
- the personal data have been unlawfully processed
- the personal data have to be erased for compliance with a legal obligation

We have put procedures in place to manage this process to ensure that the request is dealt with in a timely fashion.

Providing individuals with personal data from MindaClient

A person is entitled to a copy of their data. We have outlined the procedure how this data can be extracted in a digital format and forwarded securely to the data subject.

Subject Access Request (SARS) Policy

A SARS request can be submitted in writing, electronically (e.g. via email) or via traditional post.

Under GDPR regulations, a subject has the right to request and obtain confirmation as to whether their personal data is being processed

The SARS request must be responded to in writing within 30 days of the receipt of the request.

We have put procedures in place to manage this process, including reminders to ensure that the request is dealt with in a timely fashion.

Legitimate Interest

There are a number of reasons that are deemed to be legitimate bases for processing data.

- a) the data subject has given consent
- b) processing is necessary for the performance of a contract
- c) processing is necessary for compliance with a legal obligation
- d) processing is necessary in order to protect the vital interests of the data subject
- e) processing is necessary for the performance of a task carried out in the public interest
- f) processing is necessary for the purposes of the legitimate interests

MindaClient believes that (b) and (f) cover all instances of our data processing.

We have adapted MindaClient software so that the legitimate interest of processing a subjects data can be recorded opposite every client

Types of Data Collected by MindaClient

We outline the types of data that is collected and processed by MindaClient. This includes

- Current Client Data
- Former Client Data
- Current Employee Data
- Former Employee Data
- Supplier Data

MindaClient Data Retention & Deletion Policy

We have prepared a comprehensive Data Retention and Deletion policy that sets out the timeframes for retention and deletion of all of the following categories of data.

- Accounting and Finance
- Contracts
- Client Records
- Correspondence and Internal Memoranda
- Electronic Documents

- Payroll Documents
- Personnel Records
- Tax Records

Contracts with our Suppliers

We have agreements with our third party contractors certifying their compliance with current GRPR regulations.

Data Processing Agreement

We have a Data Processing Agreement which we provide to our clients. This is a requirement under GDPR.

A templated copy of this available at the footer of our MindaClient website.