



The nature of FirstClass is that it may handle potentially large volumes of personal data, and so compliance with data protection legislation is a very important part of what we do when we develop our products.

Although responsibility for compliance when using FirstClass will always rest with you, we endeavour to make our software operate in such a way as to maximise your ability to operate in a compliant manner. This has included product reviews with specialist data protection solicitors and practitioners to get their input as to how our software can be improved.

We also understand how important it is for us to handle our customer's data responsibly, and so we have set out below some of the ways in which we ensure that you can trust us, and our software, with your personal data.

## Features

FirstClass has the following features as standard:

### Deletion

FirstClass has the functionality to permanently delete individual persons or contacts via the system. Related records may need manually deleting first, again through the system, as part of this process to ensure data integrity. Obviously, this feature is only enabled for users with valid security rights.

### Review Reminders

Reminders can be set via reviews against a legacy within the system. This could then be used as a reminder to anonymise the data after a certain period of time.

### Complete Data Retrieval and Reports on Data Subjects.

Should you need to respond to a subject access request or any other disclosure requirements, FirstClass can easily report on and provide copies of any records. With multiple search criteria this enables you to collate or review the personal data with ease.

## Data Encryption

Transparent database encryption can be enabled at the SQL server database level as long as the server edition and version support this. This means the database files and backup files would be encrypted. It would be the responsibility of your IT department to manage your encryption keys.

## Installation, Configuration and Support Services

Because we may from time to time have access to personal data on your behalf, we may be considered a data processor and will therefore not only have obligations to you, the data controller, but also to the Information Commissioner's Office and the data subjects themselves.

We are bound to keep records as to the nature of any processing done on your behalf. Usually this is only during installation and configuration services, or where we are providing support to you.

We have adopted good industry practice in securing our own internal networks, and this is regularly reviewed.

We have also adopted best practice by permanently deleting customer data once it is no longer needed. Occasionally this may mean that we have to ask you to supply us with it again, but we think it is better this than to hold data for longer than necessary.

All our employees have been trained on data protection and are aware of their responsibilities to keep personal data secure.

## What you need to be aware of

Whilst we do what we can to help you be compliant, you need to be aware of the following points:

- Responsibility for compliance with data protection legislation remains with you at all times. We have endeavoured to develop our products in such a way as to assist you in your compliance efforts but cannot be held responsible for your use of our products.
- As the underlying database is held locally on your own systems, then you will be responsible for ensuring that appropriate technological and organisational measures are in place to secure the personal data within it.
- You are responsible for providing data subjects with appropriate information about any data processed by you in respect of them or obtaining consent to such processing if required. All data processing must be transparent, fair and lawful and so whilst our software can be used to store, access and analyse large quantities of personal data, you need to ensure that you have made the data subjects aware of how you will be using any data collected.
- Take care when inputting data into FirstClass as it is highly likely to be considered personal data. Ensure that you meet one or more of the lawful basis's for processing such personal data.
- You should take appropriate legal advice in respect of your obligations under data protection legislation, and where appropriate cyber-security advice from reputable experts.