

Privacy policy & data subject rights

This policy aims to support your right to be informed. The document covers how we process the data of individuals who are clients, prospects, staff or suppliers.

Identity and contact details

Please [click here](#) to find out more about Cambric Systems Limited (Cambric). Our postal address is PO Box 7012, Forfar, DD8 0BN. Our telephone number is +44 (0) 1382 217050. You can contact us by email using hi@cambric.co.uk. We are a limited company registered no. SC215320 (Scotland).

Our designated supervisory authority under the UK's General Data Protection Regulation (GDPR) is the Information Commissioner's Office (ICO). We are based in the United Kingdom.

To contact the individual in charge of Data Protection in our company please contact us using hi@cambric.co.uk.

What data we process

Cambric processes data on:

- Customers.
- Prospects (including ex-clients).
- Staff.
- Suppliers.

Customers

Cambric captures information on individuals in customers and prospective customers who are buying or interested in buying products from us. We process this data so that we can engage with the individuals to provide their organisations with our products, or we process the data as we are taking steps to enter into a contract to provide these products.

We capture this information either directly, through the 'Contact us' form on our website, where the prospective customers get in touch with us on email or telephone, or through details we capture at exhibitions. Where a prospective customer signs up to our services, we update the data on the individuals in the course of our regular contact with the customer through the provision of our services.

The information we capture on these individuals will include basic contact details such as name, telephone number and email address.

We use a reason of '[contract](#)' to process this data as we are taking steps towards providing products and services to these individuals, or are providing our products, when we capture and process this data.

We do not capture [special category](#) or criminal offence data on these individuals.



Prospects

Cambric captures information on individuals who we believe could have a need for our services. We can use this data for direct marketing to the individuals who are corporate employees of the organisations that we target.

We either capture this data directly from the individuals in the process of selling to them, we can have their details passed to us as referrals from existing customers, or we can licence this data from reputable data providers.

The information we capture on these people will include basic contact details such as name, telephone number, email address and postal address.

We process this data using '[legitimate interests](#)'. We have conducted our gating and balancing tests to determine whether our legitimate interests do not outweigh the rights and freedoms of the individuals we are targeting.

We do not process special category data on these individuals.

Staff

We process information on staff in several ways.

For the execution of the contract

We process data for the purposes of engaging in a contract of employment or other work for Cambric, or if individuals are taking steps to enter into a contract (for example for recruitment). We capture this information in the course of recruiting and 'on-boarding' an individual to work with us.

The information we capture for this reason will include basic contact details such as name, telephone number, email address, postal address and details needed to process payments under the contracts such as bank account details and national insurance numbers. We will also capture information that relates to the appraisal of performance and timekeeping.

We use a lawful basis of 'contract' to process this data.

We can also capture special category information as the processing of this data is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection.

We capture criminal offence information (specifically, we use the Disclosure Scotland Service to check criminal records for staff we intend to hire) on this data. The reason we process the Criminal Offence data is when preventing or detecting unlawful acts.

We have completed an appropriate policy to cover the use of this special category and criminal offence data.

Staff benefits

We process information on staff and can pass data on to specific parties because we are acting as an intermediary to a contract between the member of staff and the third party. For example, where we organise pension payments for staff. We capture this information as a part of the employee 'on-boarding' process and we update the data at regular intervals.

The information we capture for this reason will include basic contact details such as name, telephone number, email address and postal address.

We use a lawful basis of contract to process this data.

We do not capture special category information on this data.

Operational reasons

We process information on staff and their emergency contacts where it is in Cambric's interest to do so for operational purposes. For example, to keep staff up to date with Cambric news, to maintain a list of the staff's emergency contacts for communication if needed, or to create business cards for staff. We capture this information as a part of the employee 'on-boarding' process and we update the data at regular intervals.

The type of data that we process for this need includes name, email address and telephone number.

We use the lawful basis of legitimate interests to process this data. We have completed the specification, gate analysis and balancing tests specified under GDPR for this data.

We do not capture special category information on this data.

In an emergency, we could use 'Vital interests' as a reason for processing this data if we need to transfer data to health authority personnel.

Suppliers and partners

We process information on suppliers and partners so that we can purchase goods and services from them. We capture this information either from recommendations or by using data provided by the suppliers on their web sites or directories.

The type of data that we process for this need includes name, email address, telephone number.

We use a lawful basis of contract to process this data.

We do not capture special category information on this data.

Other processing

We also anonymise data on individuals so that we can retain information for analytical purposes.

We are occasionally given remote access to our customers' systems so that we can investigate and fix issues that may occur with our software. If this happens, we do not process personal data, the access is achieved through the guidance of the customer and the customer monitors our access to their systems. We do not consider ourselves to be a data processor of our customer's data in these circumstances.

Any recipient or categories of recipients of the personal data

Cambric pass data on to other data controllers for the following purposes:

- For data relating to those applying to be members of staff or for staff who have found other employment after the end of a contract, we share data with third parties to obtain and provide references.
- As the data controller of data, we may provide access to data processors that process data on our behalf, who will only process the data according to the written instructions in the Data Processing Agreements in place with them.
- We share data with organisations with which we have a legal obligation to share data (for example HMRC and Companies House).
- We share data on individuals with organisations where we are acting as an intermediary between the individual and an organisation providing services to the individual (for example pension providers for staff, or the Royal Mail if we send parcels or letters to customers).

Details of transfers to third country and safeguards

We will not transfer your data to countries outside the UK to destinations that are not considered 'adequate' by relevant legislation without additional safeguards. Any additional safeguards that are required and obtained are documented in our internal data protection policy. A part of these additional safeguards will involve creating and maintaining International Transfer Assessments.

We transfer data to other organisations who are processors of data that we control. We maintain a list of data processors and ensure that we have data processing agreements between Cambric and the data processor. Where relevant and if the data processor transfer data outside of the UK and EEA, we obtain commitment from the data processors that additional safeguards are in place. These are documented in our data protection policy.

Cambric transfer personal data to other controllers. We do this to that we can operate as a business, for example to communicate with our customers through mail delivery organisations such as the Royal Mail.

We can transfer personal data to our reseller Softcat, where they acquire, or are in the process of acquiring, a new customer for our software. In these situations we discuss the network of contacts we might have in the new customer or prospect, and if Cambric have contacts which might be relevant to the success of the implementation or sale of Cambric's software, and Softcat do not have these contacts, then we can share the personal details of these contacts.

Retention period or criteria used to determine the retention period

- We will retain information on customers for 7 years after the latest use of our software as we will need to retain this information for financial purposes.
- We will retain information that we use on prospective customers for the purposes of direct marketing for 2 years after the latest interaction with the individual.
- We will retain information that we use on prospective customers for the purposes of direct marketing for 2 years after the latest interaction with the individual where we use consent as a lawful basis for processing the data.
- We will retain information on staff members for 7 years after their employment with us ends, as we need to retain information on staff members for legal reasons.
- We will retain information on individuals who we have details on for recruitment purposes, but who have not gone on to be employees, for 1 years after the job role that they were being considered for has been filled. If we believe that their details may be suitable for future roles, we will obtain their consent to retain their CVs for longer periods.
- We will retain the details of the suppliers or partners for as long as we might have a need for the services that the supplier or partner offer.

If these data retention timescales clash with legal or contractual obligations then these other obligations will override the retention timescales outlined. For example, UK limited companies are required to retain records on tax paid for 6 years.

All records are disposed of securely when deleted.

How we look after data

We take reasonable technical and procedural precautions to prevent the loss, misuse or unauthorised alteration of personal data.

We store the personal data that we collect securely.

We do not publish the details of the safeguards we use to protect the personal data that we control as this could reduce the effectiveness of those safeguards.

Cookies

Cookies are text files placed on your computer to collect information about which pages you visit, and how long for. This information is used to track use of the website and to compile statistical reports on website activity.

Our website does not use third-party cookies, and only uses first-party cookies that are essential for the working of the website.

When you visit our website you are notified that cookies are used.

Other websites

Our website contains links to other websites. This privacy policy only applies to this website, so when you link to other websites you should read their own privacy policies.

Your rights

Cambric recognises the rights of individuals as defined in the UK's GDPR.

We will always seek to uphold those rights and the links provided will enable you to communicate with us to exercise those rights, where relevant.

- Your right to be informed (this page and further information in communications we might send to you)
- [Your right of access](#)
- [Your right to rectification](#)
- [Your right of erasure](#) (right to be forgotten)
- [Your right of restriction of processing](#)
- [Your right to data portability](#)
- [Your right to object](#)

Cambric recognises your right to lodge a complaint with a supervisory authority. You can access the ICO's website from [this link](#).