

Data Breach Policy

When implementing a Data Breach Policy it is essential that managers and all staff are fully briefed on the procedures or steps that need to be followed if a breach situation is discovered and, it is essential for staff to understand that there is an initial time period within which to report a serious breach to the ICO.

Under GDPR Notification is only required where it is likely to result in a risk to the rights and freedoms of individuals.

Where a breach has occurred but is not acted upon then it may increase the likelihood of the breach having a significant detrimental impact on an individual. Here are some examples of what could occur where data gets into the wrong hands:

- Discrimination;
- damage to reputation;
- financial loss;
- loss of confidentiality;
- other significant economic loss;
- social disadvantage.

Breaches can occur as a result of lax attention to confidentiality whether it be paper based, on screen or by unlawful access to data. Overall vigilance is encouraged and embedded across all members of staff by way of Computer and Data Protection Policies and Staff Information Security Management Systems specifically provided to comply with GDPR.

Greenfly AI Limited have a breach reporting procedure in place which is embedded across the organisation through staff training, awareness and vigilance. Staff are trained to recognise signs of potential breach and are directed to report potential or actual data breaches to the Data Compliance Officer or directly to a Director.

The Director or Data Compliance Officer must log the information in the first instance and initiate further investigation to establish whether a breach has genuinely occurred and if so, decide whether there is any substantial risk posed to the data subject/s affected by the breach.

We have systems in place to assess severity of any potential risk to the rights and freedoms of the data subject/s and take immediate steps to mitigate potential damage.

If we assess that there is a high level of risk to an individual or individuals, we will notify the Information Commissioners Office and the individual/s affected within 72 hours of discovery of the breach.

Where there is limited risk or no risk to the data subject/s the Data Protection Officer will log the breach and document the decision not to report it.

All data breaches whether low or high risk will trigger an enquiry into systems and procedures to identify what went wrong, why the breach occurred and what steps will need to be taken to protect data in the future.

Action to improve data security after a breach situation, regardless of the severity may result in a series of talks between managers and members of staff directly involved with the breach.

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PRIVACY POLICY

This privacy policy sets out our current approach and demonstrates service where personal data may from time to time be processed and when we do have access to such personal data, we want to make sure that we do not our commitment to your privacy. Greenfly AI Limited provides research & Development services to several Public Sector departments relating to Regulatory Systems. While we are primarily a business to business service we may, as part of our overall service touch consumer data. Our privacy policy tells you how we use personal information and how individuals can control the use of their data. If once you have read this policy, you wish to make any changes to the way we use your data or if you have a question please contact jan@greenfly.ai

When we contract to provide our service to our clients, we ensure that an assessment is carried out to establish and map the personal data we will be processing and data protection agreements are in place to safeguard personal data. When data is used for research purposes Data Protection Assessments will be produced to screen the extent of assessment required for each project. Personal data may be shared with us by our public body clients, this privacy policy helps you to see how your personal data may be used.

[Links to anchor pages for user to be able to select which section they wish to read]

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1.0 This Privacy Policy

1.1 Greenfly AI Limited is a Limited Company, Registration Number: 11801085
Registered Office 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ.

1.2 We are committed to protecting all personal data that we may be given when our research and development services involve processing personal data. Please read this privacy policy carefully as it contains important information about our use of your information. It explains what information we collect about you, and how we use it, including when we might disclose it to third parties.

1.3 Our services do not currently relate to individuals under the age of 18. Therefore, we do not knowingly attempt to solicit or receive any information from or about children.

1.4 Details of ICO registration can be found at www.ico.org certificate ref ZA494565

2. What information do we collect?

2.1 So that your authority can carry out necessary research initiatives to bring improvement to state regulations and other matters of public service data that you have provided to a public service provider whether you are a regulated business, or a private individual may have been collected. Depending upon the areas of research that we are working on, some of the information we will need to process will be personal to you including your name, email address, IP information and contact number. We may also need to process an address and if business related, a VAT number.

2.2 For the avoidance of doubt we do not process sensitive personal data as defined by the GDPR as data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

3.0 How do we use your Information.

3.1 In providing our service to our client business/es Greenfly AI Limited may process the data you provided to a public sector body or to a regulated service provider who may be subject to regulatory enquiry. In doing so where we process your data, we will process it legally in accordance with Article 6 1 e) of the GDPR; 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

3.2 Where the basis at 3.1 does not apply the legal basis for us to process any personal data may revert to Art 6 1 f) of the GDPR; processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or

fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. A list is provided at the end of this privacy policy and, where applicable we will carry out a 'Legitimate Interest Assessment'.

3.3 Where we have your explicit consent we may, from time to time, use your information to let you know about research services which may be of interest or benefit to you.

4.0 How long we keep your personal information

4.1 When you submit your information to a public sector service provider or regulated business that provides regulated services to you your personal data will remain in their control however Greenfly AI Limited will be a processor for the purpose of carrying out a service to you. Once we have completed our service your data will be retained for a maximum of 6 years however where possible we will purge data sooner and, where this is not possible, we will ensure that legacy data is suitably pseudomised.

4.2 To find out how long your data will be retained by the primary data controller you should refer to the privacy policy of the organisation concerned.

5.0 Sharing information with Third Party's.

5.1 We will only disclose your personal information to third parties if needed to provide our service to our client as part of the R&D service we are providing. Where we use a third party who is given access to your data every care is taken to make enquiry to satisfy ourselves that they comply with GDPR. We carry out due diligence checks to ensure that their services are compliant and secure.

5.2 From time to time we use third party suppliers and service providers who may also touch personal data that we work with or have worked with. Where any service provider collects information directly from you, we will notify you of the involvement of the supplier or service provider, and all information disclosures you make will be strictly optional.

5.3 We use third party hosting partners to provide our software framework/s, any domains and any necessary equipment to maintain your data securely, administer or develop our systems and services to you. If we do, information is only given to those third parties for that limited purpose and subject to those third parties agreeing to keep the information secure. The third parties are: Google Cloud Platform, Microsoft Azure, Amazon Web Services and GitHub.

5.4 In addition, we may provide aggregate statistics established to support our services which may include; sales, traffic patterns and related website information to reputable third-parties, but these statistics will include no personally identifying information.

6.0 Legal disclosure

6.1 We may disclose personal data to the extent permitted or required under any enactment, by rule of law, order of the Court, as requested by other government law enforcement authority, to enforce our legal rights, to operate our systems properly, or to protect ourselves or our users.

7.0 Your consent and your rights

7.1 In the course of registering and using public sector services, hybrid public sector services and the services of a regulated business information about you may be captured electronically or otherwise and transmitted to us or and, potentially, to any third parties as set out above, or to third parties who host our web servers or assist us in maintaining our website/s and portal service/s. You should refer to the appropriate privacy policy for full details.

7.2 Under the GDPR where we process personal information about an individual, including the personal information of sole proprietors, partners and company employees you have the following rights:

- To know that your data is being processed and to make a 'Subject Access Request' which can be made directly to the data controller concerned who will request any relevant data from us on your behalf.
- To access your personal data free of charge
- To data portability without undue delay
- To have your information corrected if inaccurate (Including ensuring any third party puts right any inaccuracy)
- To request that your data be erased
- To restrict processing
- To object to processing and;
- To rights relating to automated decision making and profiling

We have policies in place to assist you with any of the above rights.

7.3 You have a legal right to see a copy of the information the primary data controller holds about you, this is referred to as a Subject Access Request or SAR. When you request a SAR it is provided free of charge and within 30 days however, the data controller may ask for identification and where applicable authority to release information to a person appointed to act on your behalf. Before you request a SAR you should read the section headed Subject Action Request of our policy document by following the link above 'GDPR POLICY'. You should make your request here [SAR](#)

7.4 You also have the right, in relation to your personal data held to correct any errors in the information that the data controller may hold about you which should then be cascaded to the relevant third-party processors such as us.

8.0 How do Greenfly AI Limited protect user information?

8.1 The GDPR's require that we follow strict security procedures in the storage and disclosure of information which you have provided via our services to

prevent unauthorised access. All data is stored and secured in line with our Information Security Management System Policy.

9.0 What are 'Cookies' and how do we use them?

9.1 Our website uses cookies so, if you visit our site to find out more about the services we provide to our clients cookies will be collected. A cookie is a small file of letters and numbers that we put on your computer or device if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and allows us to improve our site and services. The cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way our website works, for example by ensuring that users are finding what they are looking for easily.

9.2 Most browsers accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you may not be able to use certain features of this website.

9.3 We may conduct analyses of user traffic. These analyses will be performed through the use of IP addresses and cookies which are required to ensure a secure server connection. We do not use cookies to store any personal data or browsing habits.

10.0 Changes to privacy policy

10.1 We reserve the right to add to or change the terms of this privacy policy in our sole discretion, without prior notice to you. If we change this privacy policy, we will post the new privacy policy on the website, and it will become effective from the time of posting to the website. Please visit this privacy policy on a regular basis to make sure you have read the latest version and you understand what we do with your information. Wherever possible, we will give you notice of any changes prior to their implementation.

11.0 General

11.1 Our website and our portal/s may contain links to other affiliate websites. Please be aware that save for those websites owned by us, we are not responsible for the privacy policies of such other sites. We encourage users to read the privacy statements of each website that collects personally identifiable information. This privacy statement applies solely to information collected by our website and our portal/s.

11.2 We are not responsible for any third party offering goods and services via websites linked to our website or portal/s and what they propose to do with information about you. To that end please ensure you read their terms and conditions carefully.

12.0 What to do if you have a Complaint

12.1 If you are unhappy with any aspect of personal privacy as part of our service you may complain to us by following our complaints procedure which is available on request. If you are dissatisfied once we have dealt with your complaint you are entitled to contact the ICO whose contact information is available at www.ico.org.uk where you can also find further information about data protection issues.

13.0 Contact

13.1 If you have any questions about our privacy policy or the information we hold about you please contact us at the address below or email jan@greenfly.ai

23 Tuphall Close, Derby, DE73 6WN

If you have any further questions you may email our Research Data Officer info@lstop-cmc-solutions.co.uk

LEGAL BASIS FOR PROCESSING TABLE – Greenfly AI Limited

Our use of your data	Legal basis for processing
To carry out our contract with our clients to provide a variety of research services to public sector organisations	Necessary for the performance of our contract with our client
To send you research information as required to service the research contract we have been appointed to carry out	Our use of your data is necessary for our legitimate interest of making sure that the service we provide is managed effectively
To manage the effectiveness of our online service and to deliver our services to you	Our use of your data is necessary for our legitimate interest of making sure that the service we provide is managed effectively
To make recommendations about research etiquette and to protect individuals from scam research	Our use of your data is necessary for our legitimate interest of making sure that the service we provide is managed effectively
To make sure that the content of our websites is presented as effectively as possible so that you can use the service effectively	Our use of your data is necessary for our legitimate interest of making sure that the service we provide is managed effectively
To create statistical information which will help us manage the service we provide and make improvements to the service	Our use of your data is necessary for our legitimate interest of making sure that the service we provide is managed effectively
To monitor our website and service to make sure it is functioning correctly and to its optimum and to be able to correct any issues to improve our research services	Our use of your data is necessary for our legitimate interest of making sure that the service we provide is managed effectively
To allow our customers to access the interactive features of the website and any portals	Our use of your data is necessary for our legitimate interest of making sure that the service we provide is managed effectively
To protect your personal information when you use our website and when you make a purchase	To protect your data and your identity