

VMS Software Ltd- Data Protection Privacy Policy

Introduction

The purpose of this document is to provide a concise policy statement regarding the Data Protection obligations of VMS Software Ltd. This includes obligations in dealing with personal data, in order to ensure that the organisation complies with the requirements of the relevant legislation, namely the General Data Protection Regulation.

Rationale

VMS Software Ltd must comply with the Data Protection principles set out in the relevant legislation. This Policy applies to all Personal Data collected, processed and stored by VMS Software Ltd in relation to its staff, service providers and clients in the course of its activities. VMS Software Ltd makes no distinction between the rights of Data Subjects who are employees, and those who are not. All are treated equally under this Policy.

Scope

The policy covers both personal and sensitive personal data held in relation to data subjects by VMS Software Ltd. The policy applies equally to personal data held in manual and automated form.

All Personal and Sensitive Personal Data will be treated with equal care by VMS Software Ltd. Both categories will be equally referred-to as Personal Data in this policy, unless specifically stated otherwise.

VMS Software Ltd as a Data Controller

In the course of its daily organisational activities, VMS Software Ltd acquires processes and stores personal data in relation to:

- Employees of VMS Software Ltd
- Customers of VMS Software Ltd
- Third party service providers engaged by VMS Software Ltd

In accordance with the Data Protection legislation, this data must be acquired and managed fairly. Not all staff members will be expected to be experts in Data Protection legislation. However, VMS Software Ltd is committed to ensuring that its staff has sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, staff must ensure that the Data Protection Officer is informed, and in order that appropriate corrective action is taken.

Due to the nature of the services provided by VMS Software Ltd, there is regular and active exchange of personal data between VMS Software Ltd and its Data Subjects. In addition, VMS Software Ltd exchanges personal data with Data Processors on the Data Subjects' behalf.

This is consistent with VMS Software Ltd obligations under the terms of its contract with its Data Processors.

This policy provides the guidelines for this exchange of information, as well as the procedure to follow in the event that a VMS Software Ltd staff member is unsure whether such data can be disclosed.

In general terms, the staff member should consult with the Data Protection Owner to seek clarification.

Subject Access Requests

Any formal, written request by a Data Subject for a copy of their personal data (a Subject Access Request) will be referred, as soon as possible, to the Data Protection Owner, and will be processed as soon as possible.

It is intended that by complying with these guidelines, VMS Software Ltd will adhere to best practice regarding the applicable Data Protection legislation.

Third-Party processors

In the course of its role as Data Controller, VMS Software Ltd engages a number of Data Processors to process Personal Data on its behalf. In each case, a formal, written contract is in place with the Processor, outlining their obligations in relation to the Personal Data, the specific purpose or purposes for which they are engaged, and the understanding that they will process the data in compliance with the Data Protection legislation.

The Data Protection Principles

The following key principles are enshrined in the legislation and are fundamental to the VMS Software Ltd Data Protection policy.

In its capacity as Data Controller, VMS Software Ltd ensures that all data shall:

1. ... Be obtained and processed fairly and lawfully.

For data to be obtained fairly, the data subject will, at the time the data are being collected, be made aware of:

- The identity of the Data Controller VMS Software Ltd
- The purpose(s) for which the data is being collected
- The person(s) to whom the data may be disclosed by the Data Controller
- Any other information that is necessary so that the processing may be fair.

VMS Software Ltd will meet this obligation in the following way.

- Where possible, the informed consent of the Data Subject will be sought before their data is processed;
- Where it is not possible to seek consent, VMS Software Ltd will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, legitimate interest etc.;
- Where VMS Software Ltd intends to record activity on CCTV or video, a Fair Processing Notice will be posted in full view;
- Processing of the personal data will be carried out only as part of VMS Software Ltd lawful activities, and VMS Software Ltd will safeguard the rights and freedoms of the Data Subject;
- The Data Subject's data will not be disclosed to a third party other than to a party contracted to VMS Software Ltd and operating on its behalf.

2. Be obtained only for one or more specified, legitimate purposes.

VMS Software Ltd will obtain data for purposes which are specific, lawful and clearly stated. A Data Subject will have the right to question the purpose(s) for which VMS Software Ltd holds their data, and VMS Software Ltd will be able to clearly state that purpose or purposes.

3. Not be further processed in a manner incompatible with the specified purpose(s).

Any use of the data by VMS Software Ltd will be compatible with the purposes for which the data was acquired.

4. Be kept safe and secure.

VMS Software Ltd will employ high standards of security in order to protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by VMS Software Ltd in its capacity as Data Controller. This should be read in conjunction with our online backup protection policy. Access to and management of staff and customer records is limited to those staff members who have appropriate authorisation and password access.

5. ... Be kept accurate, complete and up-to-date where necessary.

VMS Software Ltd will:

- Ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy;
- Conduct periodic reviews and audits to ensure that relevant data is kept accurate and up-to-date. VMS Software Ltd conducts a review of sample data every six months to ensure accuracy; Staff contact details and details on next-of-kin are reviewed and updated every two years.
- Conduct regular assessments in order to establish the need to keep certain Personal Data.

6. ... Be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed.

VMS Software Ltd will ensure that the data it processes in relation to Data Subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.

7. ... Not be kept for longer than is necessary to satisfy the specified purpose(s).

VMS Software Ltd has identified an extensive matrix of data categories, with reference to the appropriate data retention period for each category. The matrix applies to data in both a manual and automated format.

Once the respective retention period has elapsed, VMS Software Ltd undertakes to destroy, erase or otherwise put this data beyond use.

8. ... Be managed and stored in such a manner that, in the event a Data Subject submits a valid Subject Access Request seeking a copy of their Personal Data, this data can be readily retrieved and provided to them.

VMS Software Ltd has implemented a Subject Access Request procedure by which to manage such requests in an efficient and timely manner, within the timelines stipulated in the legislation.

Data Subject Access Requests

As part of the day-to-day operation of the organisation, VMS Software Ltd staff engage in active and regular exchanges of information with Data Subjects. Where a formal request is submitted by a Data Subject in relation to the data held by VMS Software Ltd, such a request gives rise to access rights in favour of the Data Subject.

There are specific time-lines within which VMS Software Ltd must respond to the Data Subject, depending on the nature and extent of the request.

VMS Software Ltd staff will ensure that, where necessary, such requests are forwarded to the Data Protection Owner in a timely manner, and they are processed as quickly and efficiently as possible, but within not more than one month from receipt of the request.

Implementation

As a Data Controller, VMS Software Ltd ensures that any entity which processes Personal Data on its behalf (a Data Processor) does so in a manner compliant with the Data Protection legislation.

Failure of a Data Processor to manage VMS Software Ltd data in a compliant manner will be viewed as a breach of contract, and will be pursued through the courts.

Failure of VMS Software Ltd staff to process Personal Data in compliance with this policy may result in disciplinary proceedings.

Definitions

For the avoidance of doubt, and for consistency in terminology, the following definitions will apply within this Policy.

Data	This includes both automated and manual data. Automated data means data held on computer, or stored with the intention that it is processed on computer. Manual data means data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system.
Personal Data	Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller. (If in doubt, VMS Software Ltd refers to the definition issued by the Article 29 Working Party, and updated from time to time.)
Sensitive Personal Data	A particular category of Personal data, relating to: Racial or Ethnic Origin, Political Opinions, Religious, Ideological or Philosophical beliefs, Trade Union membership, Information relating to mental or physical health, information in relation to one's Sexual Orientation, information in relation to commission of a crime and information relating to conviction for a criminal offence.
Data Controller	A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.
Data Subject	A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.
Data Processor	A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.
Data Protection Owner	A person appointed by VMS Software Ltd to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients
Relevant Filing System	Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.

VMS Software Ltd - Website Privacy Policy

Key details

This website privacy policy describes how VMS Software Ltd protects and makes use of the information you give the company when you use this website.

If you are asked to provide information when using this website, it will only be used in the ways described in this privacy policy.

This policy is updated from time to time. The latest version is published on this page.

This website privacy policy was updated on: 1st February 2018

If you have any questions about this policy, please email info@gds.co.uk or write to: VMS Software Ltd, Minster House, 23 Flemingate, Beverley, HU17 0NP

Introduction

We gather and use certain information about individuals in order to provide products and services and to enable certain functions on this website.

We also collect information to better understand how visitors use this website and to present timely, relevant information to them.

What data we gather

We may collect the following information:

- Name and Business Name
- Contact information including address, phone number and email address
- Website usage data
- Other information relevant to client enquiries

How we use this data

Collecting this data helps us understand what you are looking from the company, enabling us to deliver improved products and services.

Specifically, we may use data:

- For our own internal records.
- To improve the products and services we provide.
- To contact you in response to a specific enquiry.
- To customise the website for you.
- To send you promotional emails about products, services, offers and other things we think might be relevant to you.

- To send you promotional mailings or to call you about products, services, offers and other things we think might be relevant to you.
- To contact you via email, telephone or mail for market research reasons.

Cookies and how we use them

What is a cookie?

A cookie is a small file placed on your computer's hard drive. It enables our website to identify your computer as you view different pages on our website.

Cookies allow websites and applications to store your preferences in order to present content, options or functions that are specific to you. They also enable us to see information like how many people use the website and what pages they tend to visit.

How we use cookies

We may use cookies to:

- **Analyse our web traffic using an analytics package.** Aggregated usage data helps us improve the website structure, design, content and functions.
- **Identify whether you are signed in to our website.** A cookie allows us to check whether you are signed in to the site.
- **Test content on our website.** For example, 50% of our users might see one piece of content, the other 50% a different piece of content.
- **Store information about your preferences.** The website can then present you with information you will find more relevant and interesting.
- **To recognise when you return to our website.** We may show your relevant content, or provide functionality you used previously.

Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

Controlling cookies

You can use your web browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device, you should set your web browser to refuse cookies.

However, please note that doing this may affect how our website functions. Some pages and services may become unavailable to you.

Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it.

To learn more about cookies and how they are used, visit [All About Cookies](#).

Controlling information about you

When you fill in a form or provide your details on our website, you will see one or more tick boxes allowing you to:

- Opt-in to receive marketing communications from us by email, telephone, text message or post.
- Opt-in to receive marketing communications from our third-party partners by email, telephone, text message or post.

If you have agreed that we can use your information for marketing purposes, you can change your mind easily, via one of these methods:

- Send an email to info@vms.co.uk
- Write to us at our office address.

We will never lease, distribute or sell your personal information to third parties unless we have your permission or the law requires us to.

Any personal information we hold about you is stored and processed under our data protection policy, in line with the General Data Protection Regulation 2018.

Security

We will always work to hold your information securely.

To prevent unauthorised disclosure or access to your information, we have made use of strong physical and electronic security safeguards.

We also follow stringent procedures to ensure we work with all personal data in line with the General Data Protection Regulation 2018.

Links from our site

Our website may contain links to other websites.

Please note that we have no control of websites outside the vms.co.uk domain. If you provide information to a website to which we link, we are not responsible for its protection and privacy.

Always be wary when submitting data to websites. Read the site's data protection and privacy policies fully.