



COMPUTING SOLUTIONS (GB) LTD

GDPR STATEMENT

Computing Solutions is committed to fulfilling its obligations under the General Data Protection Regulation (GDPR). The following information is provided to clients as evidence of how Computing Solutions seeks to satisfy the requirements of the Regulation.

This document is to be read in conjunction with the Terms and Conditions which can be found on the Computing Solutions website at:

https://www.computing-solutions.org/wp-content/uploads/2013/06/CS_Terms_Conditions.pdf

and to which all services and contracts are subject. In particular, section 14 of that document relates to the measures Computing Solutions has always had in place in relation to data protection. Those measures remain unchanged and provide clarity about each party's responsibility in handling data throughout its lifecycle.

DEFINITIONS

Computing Solutions is both a data processor and a data controller.

Data Processor

Computing Solutions is a data processor for all client hosting services, and to that end is registered with the Information Commissioner's Office (ICO), registration number Z2868990. Computing Solutions makes use of infrastructure provided by UKFast (for which a separate GDPR statement is attached). UKFast is also therefore a data processor for Computing Solutions' clients. Computing Solutions provides the hosting services but it does not control what is hosted. The client is the data controller in this relationship due to having the responsibility of deciding what data is collected and hosted on their website.

Data Controller

Computing Solutions is a data controller for the information it holds on clients. This information consists of contact names, email addresses, phone numbers and account details. Computing Solutions collects this information to ensure it can successfully provide the services clients pay for.

Computing Solutions reserves the right to store this information for clients, and to make contact using this information for anything service related. Computing Solutions reserves the right to store this information for the duration of the relationship with the client, and for any period thereafter necessary for compliance with legal or audit requirements.

TRAINING

Staff at Computing Solutions have undergone accredited GDPR training to gain certification in matters relating to the GDPR and to provide clients with both the best service and the best advice on the GDPR and how it affects them. Please don't hesitate to contact Computing Solutions if you would like assistance in this area.

HOW WE HANDLE DATA ABOUT OUR CLIENTS

All personally identifiable information relating to clients is stored within Computing Solutions' closed network, which allows for full control over who has access to the data. Computing Solutions will not share any client information with third parties unless absolutely necessary to deliver the services clients have paid for; for example, third party software vendors. Computing Solutions does not use any sub-processors in its service delivery.

HOW WE HANDLE DATA CLIENTS HOST WITH US

The data clients host through Computing Solutions is stored on UKFast's infrastructure. UKFast is solely based within the UK and will never transfer data outside of the EEA. All UKFast datacentres are located in Manchester (full address: UKFast, Unit 19&20 Cobra Court, 2 Blackmore Road, Stretford, Manchester, M32 0QY). For more information about UKFast and the numerous security measures they have in place, please see their GDPR statement which is attached to this document.

Computing Solutions carries out automated back-ups of all data hosted through us at least daily, in order to provide a resilient hosting service and to allow for recovery after unforeseen circumstances.

Computing Solutions' staff will only directly interact with the data clients host with us on the instruction of the client. This may include remedial tasks such as restoration of data from back-ups, merging of duplicate records, troubleshooting, and other tasks as specified by the client.

NOTIFICATION OF A PERSONAL DATA BREACH

Computing Solutions will respond to any data breach discovered and will notify clients within the time frame mandated by the GDPR. It will also alert the ICO in the case of a data breach.

For data breaches that relate to data clients host with us, Computing Solutions has a duty of care to inform clients of any breaches we discover, or breaches we are informed about by UKFast. The client, as data controller, is then responsible for alerting the ICO of the data breach within the time frame mandated by the GDPR.

For any further information relating to Computing Solutions' GDPR efforts, please contact support@computing-solutions.org

*Prepared May 2018
Computing Solutions (GB) Ltd*



UKFAST GDPR FAQs

UKFAST GDPR STATEMENT

UKFast is committed to fulfilling its obligations required by the GDPR. Compliance with the regulation requires ongoing work and is not something that can be satisfied and measurable as a matter of one time compliance.

The following information is provided to clients as evidence of how UKFast seeks to satisfy the requirements stated in the 99 articles.

UKFAST DEFINITION

UKFast is both a data processor and a data controller.

Data Processor: UKFast is a data processor for all client infrastructure hosted by it. UKFast provides the infrastructure (core power, networking, cloud management infrastructure, security & monitoring services) for clients to use but does not control what the infrastructure is used for. The client is the data controller in this relationship due to having the ability to decide what data is collected on the platform. Clients have the responsibility to inform UKFast of what they are using the infrastructure for from 25th May 2018 onwards.

Data Controller: UKFast is a data controller for the information it holds on clients and employees. This information is a collection of contact names, email addresses, phone numbers, account details, complaints and concerns. UKFast collects this information to ensure it can provide the service clients pay for successfully.

UKFast reserves the right to store this information for clients and to make contact using this information for anything service related. UKFast reserves the right to store this information for a set period of time outlined within our privacy policy or where necessary for compliance with legal or audit requirements.

UKFast have implemented company-wide training additional to the compulsory information security training all employees must go through. The additional GDPR training delivered is specific to each department within UKFast with examples of how it will affect employees handling of personally identifiable information in their day to day role. All employees will have to pass a GDPR quiz to prove training has been successful.

GDPR FAQs

THE GENERAL DATA PROTECTION REGULATION (GDPR) IS THE EU'S LEGISLATION FOR THE PROTECTION OF PERSONAL DATA IN EUROPE.

IT IS VITAL THAT YOU UNDERSTAND YOUR RESPONSIBILITIES AND THE VALUE OF YOUR RELATIONSHIP WITH YOUR CLOUD HOSTING PROVIDER AS PART OF YOUR GDPR COMPLIANCE JOURNEY.



Disclaimer: The information in this document is for your general guidance only and is not and shall not constitute legal advice. If you need advice on your rights or responsibilities or any legal advice around data protection matters, please obtain specific legal advice and contact an adviser or solicitor.

DATA PROCESSING AGREEMENTS:

UKFast has issued data processing agreements as part of all new contracts created. These have been created using the GDPR articles and controls from ISO 27018, providing transparency and accountability of each party's responsibility in handling data through its lifecycle. For more information on what is covered in this agreement, please refer to your contract terms.

UKFAST COMPLIANCE

UKFast has in place an integrated management system that all employees must comply with. UKFast's management system is audited multiple times a year and is certified against ISO 27001, 27018, 22301, 9001, 14001, Cyber Essentials + & additionally include an attestation of compliance as a PCI DSS Level 1 Service Provider. UKFast gains these certifications to provide clients with reassurance of our ability to handle information securely. For more information please request our ISO 27001 Statement of Applicability.

DATA MAPPING

UKFast has undertaken internal audits throughout the business to understand all systems used by departments and what personal data is stored / accessed. The locations of these systems have then been mapped and documented, along with the system administrators responsible for maintaining the data protection controls. All systems UKFast uses to store personally identifiable information relating to clients are hosted within UKFast's own datacentres which allow for full control over who has access to the hardware and software used to manage the data.

UKFast will not share any client information with third parties unless absolutely necessary to deliver the services; for example third party software vendors. UKFast does not use any sub-processors in its service delivery. UKFast clients have the ability to refer potential clients through our partnership portal, for more information around consent and liability concerning partner referrals, please see the privacy policy and partner agreement.

UKFast is solely based within the UK and will never transfer data outside of the EEA. All UKFast datacentres are located within Manchester and all support is conducted from the head office. For more information on locations please talk to your account manager.

UKFast has a data protection officer who can be contacted by emailing DPO@ukfast.co.uk. We will only respond to questions relating to UKFast's GDPR efforts, it is not for general advice use.

Disclaimer: The information in this document is for your general guidance only and is not and shall not constitute legal advice. If you need advice on your rights or responsibilities or any legal advice around data protection matters, please obtain specific legal advice and contact an adviser or solicitor.

GDPR FAQs

TEAM CERTIFICATIONS:



Windows - MTA, MCSA, MCSE

Linux - LPIC1, LPIC2, RHCSA, RHCE, LFCE, Linux Essentials

VMWare - VCP, VCA, VSP, VOP

Cisco - CCNA, CCNP, CMSP

Citrix - CCA-V

Security - CEH, Tiger - QSTM, SSCP, compTIA Security

ISO 27001: 2013

ISO 27018: 2014

ISO 14001: 2015

ISO 9001: 2015

Cyber Essentials Plus

PAS 2060

PCI DSS Service Provider

COMPANY CERTIFICATIONS:



Carbon
Neutral
PAS 2000



INVESTOR IN PEOPLE



TECHNOLOGY PARTNERS:



GDPR FAQs

DATA PROTECTION BY DESIGN & DEFAULT

UKFast has issued data processing agreements as part of all new contracts created. These have been created using the GDPR articles and controls from ISO 27018, providing transparency and accountability of each party's responsibility in handling data through its lifecycle. For more information on what is covered in this agreement, please refer to your contract terms.

SECURITY OF PROCESSING

UKFast has a duty of care to ensure that the core management infrastructure that UKFast utilises to provide support to clients has adequate security controls protecting it. UKFast uses an internal support network to access all client infrastructure, with dedicated teams for each technology supported. All engineers are DBS checked as a minimum, with engineers who work on government infrastructure going through additional Security Clearance. This domain is regularly penetration tested and vulnerability scanned weekly to ensure it is patched and up to date. All engineers' access to client infrastructure is time and date stamped and can be reviewed when required.

NOTIFICATION OF A PERSONAL DATA BREACH TO THE SUPERVISORY AUTHORITY

UKFast has a dedicated incident response team in place that will respond to any data breach discovered and be responsible for escalating to senior management, account managers, and clients, within the time frame mandated by GDPR and client contracts. UKFast has an escalation plan for alerting the ICO in the case of a data breach.

For data breaches that relate to client infrastructure, UKFast has the duty of care to inform clients of any breaches we discover. UKFast monitor various internet feeds and outgoing traffic which forms our "abuse queue". UKFast engineers monitor this queue and any clients that suffer a breach will be alerted by an UKFast engineer with any details that are available at the time of discovery. The client then has the requirement to alert the ICO of the data breach within the frame mandated by the GDPR.

TO COMPLY WITH THE GDPR, ALL BUSINESSES MUST HAVE A COMPREHENSIVE UNDERSTANDING OF THE DATA THEY POSSESS, WHERE IT IS STORED, HOW IT IS USED AND WHO CAN ACCESS IT.

PARTNERING WITH A CLOUD PROVIDER THAT IS ISO 27018 CERTIFIED AND ABLE TO PROVIDE IN-HOUSE EXPERTISE, TAKES SOME OF THE PRESSURE OFF ORGANISATIONS STRIVING TO MEET THE GDPR'S EXTENSIVE SECURITY REQUIREMENTS ON-PREMISE.

UKFAST'S ISO 27001 CERTIFICATION PROVES OUR DEDICATION TO PROVIDING CONSISTENTLY HIGH STANDARDS FOR STORING, TRANSMITTING AND PROCESSING DATA.

WE ARE ALSO ISO 27018 CERTIFIED. ISO 27018 PROVIDES STANDARDS THAT HOLD UP AGAINST AUDITS, CUSTOMER ENQUIRIES AND GOVERNMENT REVIEWS, AND HAS BEEN SUBSTANTIALLY INFLUENCED BY EUROPEAN REQUIREMENTS TO CREATE A SOLID BASELINE FOR CLOUD SERVICE PROVIDERS TRADING IN EUROPE FOLLOWING BREXIT.