# Iansyst Ltd - Privacy Policy

The General Data Protection Regulations (GDPR) gives more rights to you as an individual and more obligations to organisations holding your personal data.

One of the rights is the right to be informed, which means we must give you even more information than we do now about the way in which we use, share and store your personal information.

This privacy policy informs you about the increased rights you have in relation to the information we hold on you and the legal basis on which we are using it.

## How we use your information

This privacy policy tells you what to expect when Iansyst Ltd (Iansyst) collects personal information. It applies to information we collect about:

- visitors to our websites.
- complainants and other individuals in relation to data protection or freedom of information enquiry.
- people who use our services, e.g. who subscribe to our newsletters or request information from us.
- people who request or purchase goods and services from us.
- people who use iansyst for DSA provision
- job applicants, our current and former employees.

## Visitors to our websites

When someone visits www.iansyst.co.uk or www.dyslexic.com we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site.

This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

## Use of cookies by iansyst

You can read more about how we use cookies on our www.iansyst.co.uk/cookies page.

## In-website Search engine

Our website search and decision notice search is powered by WordPress. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either iansyst or any third party.

## E-newsletter

We use a third-party provider, MailChimp (The Rocket Science Group LLC d/b/a MailChimp), to deliver our e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter.

## Online customer surveys

From time to time, we conduct customer surveys using an online reporting tool hosted by SurveyMonkey (SurveyMonkey Europe UC). This company is a data processor for iansyst and only processes personal information in line with our instructions.

## Security and performance

Iansyst uses a third-party service provider to help maintain the security and performance of iansyst website. To deliver this service it processes the IP addresses of visitors to iansyst website.

## WordPress

We use a third-party service, WordPress, to publish our website and blog, and some of our associated websites. These sites are hosted in the UK data centres, which are run by Krystal Hosting Limited. We use a standard WordPress service to collect anonymous information about users' activity on our sites, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it. WordPress requires visitors that want to post a comment to enter a name and email address.

## People who contact us via social media

We use a third-party provider, Hootsuite Inc., to manage the scheduling and review of our social media interactions.

If you send us a private or direct message via social media the message will be stored by Hootsuite for three months. It will not be shared with any other organisations. Hootsuite privacy is subject to their policy which can be found here: https://hootsuite.com/legal/privacy

# Ecommerce on dyslexic.com

On iansyst's ecommerce website; dyslexic.com, we process personal data to facilitate order fulfilment and support customer enquiries. Payment card information is not stored on our servers or website(s) and is securely handled by one of our third-party providers.

Our third-party card processing providers are: Opayo who are Payment Card Industry Data Security Standards (PCI DSS) compliant.

Opayo is audited annually and is a fully approved Level 1 payment services provider. Their privacy policy can be viewed here: https://www.elavon.co.uk/privacy-policy.html

Where iansyst accept orders by telephone; we will process your payment card and billing information securely via Opayo. We will not retain card information, and store only the minimum of data required to process your transaction. Iansyst are unable to retrieve your full payment card details after the point of data entry. Personal payment card details are encrypted and are only stored for the duration of the transaction taking place.

Additionally, iansyst allow for the uploading of Personal and Sensitive Personal Data using a securely encrypted upload form via our website(s). Specifically, we ask for DSA award letters to be uploaded.

This data is required by iansyst for the purpose of processing orders, providing Assistive Technology solutions and services, and supporting students throughout their studies.

We retain data under contract for provision of these services and for a period thereafter for audit and quality control purposes. Browser and form data are encrypted via Transport Layer Security with a certified browser connection to our web servers (via an https connection).
Please also review the DSA section below for further information.

## People who call us

When you call iansyst we may collect Calling Line Identification (CLI) information. We use this information to help improve our efficiency and effectiveness.

We use a third-party provider, Convergence Communications Ltd, to manage our calls and phone systems. All calls may be recorded for training and quality purposes. All recordings are retained for up to 30 days unless required for contractual or dispute purposes.

## People who email us

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with best practice guidelines. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We use a third-party service provider, Symantec UK Ltd, to remotely scan and monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. Details of their privacy policy may be reviewed here:
https://www.symantec.com/en/uk/privacy

# People who make a complaint to us

When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually must disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

Personal information contained in complaint files will be retained in line with our retention policy. This means that information relating to a complaint may be retained for up to Seven years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

# People who use iansyst services

Iansyst offers various services to businesses, charities, public sector organisations and the public. We provide a range of specialist disability consultancy including workplace assessments, reports with proposed adjustments, disability training and individual coaching for adults with disabilities.

To facilitate providing these services, we must hold the details of the individuals ordering them as well as the individual who is receiving these services and who has given their consent to process their data.
Depending on the nature of the services undertaken we will store and process data according to various retention policies and data controls.
We sometimes use third parties to deal with some aspects of our work, but they are only allowed to process information relevant to the delivery of their contract.
If, as a customer or supplier, you would like further information on specific personal data and associated retention policy then please contact our Data Protection Officer or Customer Services.

# Iansyst premises CCTV cameras

All iansyst offices have CCTV systems (internal and external) for the purposes of premises security, and for the protection of staff and guests. Third party providers operate the CCTV services.

The data stored is subject to our CCTV providers' data retention and privacy policies. Where CCTV is in operation, we make data subjects aware of this through appropriate signage. Please contact us for specific providers of these services as this is premises specific.

# People who use iansyst for Disabled Student Solutions

When individuals apply for DSA provision, Personal Data and Special Data (broadly the nature of a person's disability) are usually provided during the needs assessment and/or throughout the procurement process.

This data is required by iansyst for the purpose of reviewing and recommending appropriate goods and services to the individual. Iansyst may request this data via our websites iansyst.co.uk and/or Dyslexic.com which are both subject to this Privacy Policy.

Data processed by iansyst in the fulfilment of DSA services may be subject to periodic review by our auditors.

Data retention policy for this data is subject to our contractual obligation, business and audit requirements.

# Job applicants, current and former iansyst employees

Iansyst is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information, please contact us at info@iansyst.co.uk

## What will we do with the information you provide for us?

All the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide for us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

## What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

## Application stage

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.

You may also be asked to provide equal opportunities and disability information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, in a way which can identify you. Any information you do provide will be used only to produce and monitor equal opportunities statistics.

## Assessments

We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by iansyst.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

## Conditional / offer of employment

If we make a conditional / offer of employment, we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability. We need some of this information for regulatory compliance, audit purposes, client and staff protection.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents; we may take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents; we will take copies.
- You may be asked to complete a criminal records declaration to declare any unspent convictions or undertake a DBS check.
- We may, depending on the role, undertake a Basic Criminal Record check. For this we need to provide your email address to the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We may also ask you to complete a questionnaire about your health and/or any disabilities. This is to ensure we can provide you with any workplace adjustments to support you in the workplace.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work

## Post start date

Our employment contract requires all staff to declare if they have any potential conflicts of interest, for the purpose of audits. When you complete a declaration, the signed document will be scanned and stored with information held on your personnel file.

## Use of data processors

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

## Third party recruitment websites

If you use a public recruitment website, you may provide personal data to an agency, this will be subject to their data privacy policy and may subsequently be provided via an online service to iansyst Ltd. Once you click apply now' you will be taken to their website, and they will hold the information you submit but iansyst may subsequently have access to it.

This data will then be processed as noted in the 'application stage' above.

## How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for a duration of 6 years, from the date of leaving your employment.
This includes your criminal records declaration, fitness to work, records of any security checks and references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign or from the point of disclosure (whichever is shorter).

Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the recruitment process or campaign.

Equal opportunities information is retained for 6 months following the closure of the recruitment process or campaign whether you are successful or not.

## How we make decisions about recruitment?

Final recruitment decisions are made by hiring managers and/or members of our recruitment team. All the information gathered during the application process is taken into account.

You can ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing: info@iansyst.co.uk

# Your rights

Under the Data Protection Act 2018, and subsequent GDPR you have rights as an individual which you can exercise in relation to the information, we hold about you.

## Complaints or queries

Iansyst tries to meet the highest standards when collecting and using personal information. For this reason, we take all complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy policy was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of iansyst's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address beslow.

If you want to make a complaint about the way we have processed your personal information, make an update or request a data removal, you can contact us – see DPO contact details below.

# Access to personal information

Iansyst tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 2018. If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding it
- tell you who it could be disclosed to
- let you have a copy of the information in an intelligible form.

To make a request to iansyst for any personal information we may hold you need to put the request in writing addressing it to our DPO, or writing to the address provided below.

## Access to personal information (continued)

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the DPO or our customer services team.

## Disclosure of personal information

In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example, we may need to share personal information with the organisation concerned and with other relevant bodies. Wherever possible we will seek your explicit consent for this.

## Links to other websites

This privacy policy does not cover the links within our website linking to other external websites. We encourage you to read the privacy statements on the other websites you visit.

## Changes to this privacy notice

We keep our privacy notice under regular review. The date of last update for this privacy policy is stipulated on the foot of this document. We will publish this on our website and make it available as a physical printed document upon request.

## How to contact us

If you wish to request information about our privacy policy, you can email dpo@iansyst.co.uk or write to:

**The Data Protection Officer**
iansyst Ltd
Head Office
Kiln Lane
off Prickwillow Road
Ely
CB7 4TX

Telephone: 01353 881 066

Email: dpo@iansyst.co.uk