

Privacy and security principles for RA Advisory P/S

This document outlines handling of personal data for RA Advisory P/S. It contains the following sections:

1. Data processor considerations.
2. Access to data on customer owned computers.
3. Storage of material exchanged with customers.
4. Data controller considerations.
5. Home page.

Data processor considerations

RA Advisory P/S does not under normal circumstances process data for any customers. Should such processing take place, the required control regime would need to be set up, and a separate agreement concerning such data processing should be made.

In case customers take the view that work performed includes data processing responsibilities beyond keeping contact information of employees with the purpose of interacting on assignments, such separate agreement should be made.

Access to data on customer owned computers

In certain situations, RA Advisory P/S may get access to personal information residing on customer computers. Typical situations would be viewing data on a customer service representative screen (for introductory purpose, the computer not controlled by staff of RA Advisory P/S) or doing analysis of data on a server or laptop belonging to a customer. In the latter case, data should be anonymized according to customer instructions, in order that it cannot be considered personal data in the GDPR sense.

In case of doing analysis, RA Advisory P/S shall follow any instructions from the customer on storage of data and under no circumstances will RA Advisory P/S copy (in any form) data from customer equipment anywhere or in any form, including to equipment belonging to RA Advisory P/S.

Storage of material exchanged with customers.

RA Advisory P/S stores material exchanged with customers, typically reports or presentations pertaining to the work for which RA Advisory P/S is engaged. The material produced by RA Advisory P/S is normally retained for future inspiration, subject to normal confidentiality as well as specific agreement with the customer concerned.

The material is stored on one or more Apple Mac computers, using Microsoft Office 365 with ATP and standard antivirus and firewall enabled. Backup is to OneDrive with regular (manual) backup to offline storage.

Data controller considerations.

The only personal data stored is information received from customers via e-mail or verbally. The information is typically name, phone number, e-mail address and business address. Often, this information is part of the standard signature of every mail.

The data is stored in Office 365 exchange with a copy to the recipient's computer. Often, the contact information is stored in part in mobile phone phonebooks.

The contact information is considered exchanged for the purpose of current or future business and for that reason does not have a termination date.

In case someone wishes to be informed of information stored, this can be arranged by mailing to the contact person stating if it is basic contact information or all e-mails sent from a specified mail address and the information will be returned. Similarly, in case of deletion. Transfer of information to other companies (the GDPR requirement of transfer of data) is not considered relevant due to the nature of the data and its use by RA Advisory P/S. Sensitive personal information should not be shared with RA Advisory P/S under any circumstances and will be deleted once detected.

Home page

The home page does not use cookies and does not store any information. It contains an email address to which request for information etc. Data transferred this way will be handled as indicated under "data controller considerations".