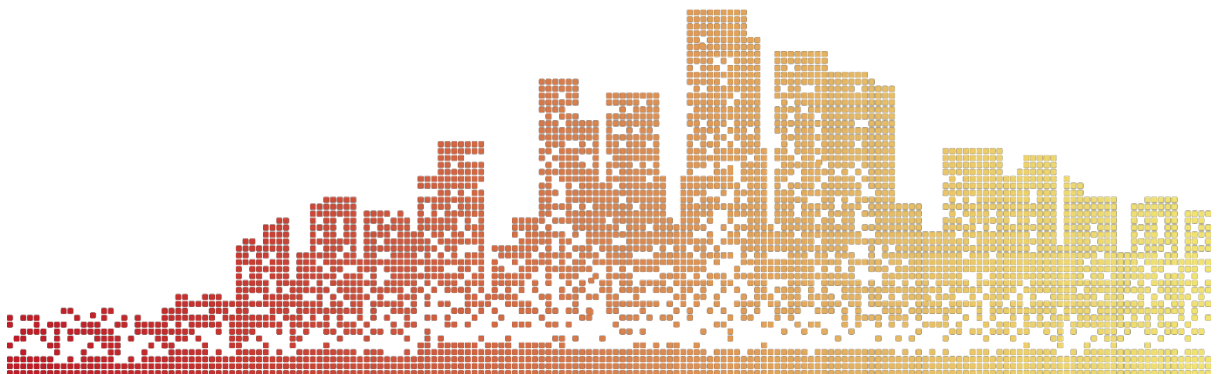




DigitalForge

Privacy Information GDPR

May 2019



1 PRIVACY INFORMATION

The information below describes everything you need to know about the data we store and process about you. This statement complies with the latest release of General Data Protection Regulations (GDPR) and applies to the BluePoint system.

1.1 WHO WE ARE, OTHERS INVOLVED

The subscription holder for your current site is the *Data Controller*. You are the *Data Subject* for your personal data we hold. We are the *Data Processor*. In the context of this document, we are;

Digital Forge Ltd, a UK company registered at The Long Barn 1, Tickenham, Bristol BS21 6RY. You can reach us at privacy@digital-forge.co.uk, or call us on +44 (0)800 368 7727 if you have any privacy concerns.

Legal Basis for Storing your data

Our legal basis for storing your personal data are 3-fold, ordered by importance.

- Vital Interest
- Legal Obligation
- Legitimate Interests

The legal basis that applies to your data depends on your role in the system and what you're doing within BluePoint. We'll reference the Legal Basis for storage and processing during this document (in particular around your rights).

1.2 YOUR RIGHTS

You need to know what your rights are regarding your personal data. These vary based on the current Legal Basis for storing and processing your data, based on your role and what you're doing in BluePoint.

	Legal Basis		
	Vital Interest	Legal Obligation	Legitimate Interests
Right to be Informed	Always		
Right to Object	No	No	Yes
Right to Access	Always		
Right to Rectification	Always		
Right to Erase	No	No	Yes
Right to Restrict	No	Yes	Yes
Right to Portability	Always		

1.2.1 Your Right to be Informed

This Privacy Information document aims to keep you informed about how we store and process your personal data and your rights relating to it. You will be emailed a link to this document when you are invited as a Visitor for the first time or set up as a User by a Site Operator.

We only send this email when an email is specified on definition in BluePoint. For example; if a host invites you using just your name (“John Smith”) we won’t be able to identify you or send you an invite. Note you can request access the next time you are being checked in – see “Right to Access” below for more information.

1.2.2 Your Right to Object

You do not have a right to object if you qualify for our *Vital Interest* or *Legal Obligations* legal basis for data storage and processing.

Site Users (Operators and Hosts) fall under the Legal Obligations legal basis, and therefore cannot object to being added to BluePoint. This is due to the Tenant Companies commercial responsibilities on site.

For example; As a Visitor, on entry to a building you cannot object to having your data stored. In the event of an evacuation, we need to know everyone on site for their own safety.

1.2.3 Your Right to Access / Rectification

We recognise your right to access and update your personal data. By signing into BluePoint you can view and update all of your personal data, such as profile details, visits performed across all our Sites. See “Signing into BluePoint”.

If we don’t have your email address you won’t be able to sign in to access or rectify your data (see “Ad-hoc Visitor” in our Technical document). When you are next checking in at a BluePoint site, ask the reception team to give you access. You’ll need to provide your email address, allowing us to invite you to BluePoint.

Once signed into BluePoint you can access your profile to view your data and perform updates.

1.2.4 Your Right to Erase

You do not have the right to erase (aka Right to be Forgotten) if you qualify for our *Vital Interest* or *Legal Obligations* legal basis for data storage and processing.

Site Users (Operators and Hosts) fall under the Legal Obligations legal basis, and therefore cannot request to be deleted. This is due to the Tenant Companies commercial responsibilities on site.

You can object to this decision by raising a complaint directly with the ICO (Information Commissioners Office).

1.2.5 Your Right to Restrict Processing

You have the right to restrict processing in BluePoint. You will still be visible to those who know your email address, but they will not be able to invite you to a Site as a Visitor or added as a new Host or Operator. Note this effectively will *black list yourself*, preventing your invitation onto BluePoint sites. Your status will be clearly communicated to those attempting to interact with you.

You also have the right to prevent all notifications (email, SMS etc) via your Profile page or by invoking the relevant link available in all BluePoint emails sent to you.

You can restrict your profile and notifications on the Profile page.

1.2.6 Your Right to Portability

You have the right to download your personal data into a portable format – in our case a CSV file (comma separated text file).

- Download your profile information and history from the Profile page.
- Use our Search page to search and download all visits, deliveries etc where you were featured.

1.3 OUR LEGAL BASIS, JUSTIFICATIONS

Our Legal Basis for storing personal data is central to GDPR and our response. How did we come to select our Legal Basis for GDPR?

1.3.1 Vital Interest

This applies when you are an active Visitor or Contractor on a BluePoint site, generally for Health and Safety purposes; to make sure we have a record of you on Site, ensure you've agreed to any relevant safety inductions and ensure you're represented accurately in mustering reports in the event of fire or other emergency warranting evacuation or similar.

1.3.2 Legal Obligation

We (the *Data Processor*) have an obligation to the *Data Controller* (the Site team, Landlord or owners) to provide accurate data about those who will, are and have visited their sites. In some cases, this can be to support Visitor and Contractor sections of PCI compliance, or other industry regulations as specified by the *Data Controller* (please contact the respective data controller for more information).

Visitor and Contractor management solutions (such as BluePoint) also provide information required to support a robust Physical Security perimeter. In the event of security incidents, there may well be a requirement for the establishment of blame, potentially leading to criminal investigations.

1.3.3 Legitimate Interest

For the purposes of providing the BluePoint services to you and our *Data Controllers* we will store and process your data. If you are not subject to our *Legal Obligations* or *Vital Interest* (not recorded as a Visitor, or currently on Site, respectively) we store and process your data using a *Legitimate Interest*.

1.4 TECHNICAL INFORMATION

For the purposes of easy digestion and separate versioning, we've moved our technical information to a separate document. We'll discuss things such as what we store about you, what we do with it, where we store it and more.

See "References" below for a link.

1.5 THIRD PARTY ACCESS

We don't provide your personal data to any third parties for marketing or any other purposes.

Site Operators and Hosts can download search results, which will include elements of your personal data (Name and BluePoint Id). At the point of download they must agree to our Third Party Terms, which transfers Data Processor responsibilities to them for the downloaded content.

1.6 CHANGES TO THIS INFORMATION

We will from time to time make changes to this information as BluePoint changes and grows. Before we implement any changes that impact your personal data we'll ensure everyone has been made aware of the changes. Primarily this will be performed at logon to BluePoint, and secondarily via email if you do not login within one calendar month of the change.

1.7 TERMS AND ABBREVIATIONS

Site	A physical building or campus, a BluePoint customer.
Tenant Company	The company of a tenant in a BluePoint building.
Site Team	A Sites management team, usually providing material facilities and concierge services.
Landlord	The owner of a Site.

1.8 QUESTIONS

- Who is your Data Protection Officer?
 - GDPR does not require a DPO for organisations with less than 250 staff.
- Where is the legal document?
 - GDPR explicitly asks for plain text documentation. This is the legal document.
- How do I invoke one of my rights?
 - You can request any of the rights in this document at anytime by talking or emailing any of our staff. We're all trained to handle your requests promptly.

1.9 REFERENCES

Digital Forge Ltd. (2018, May). *Data Privacy - Technical Information*. Retrieved from BluePoint:
https://go.bluepoint.uk.com/content/documents/privacy/current/technical_information.pdf

Digital Forge Ltd. (2018, May). *Logging into BluePoint*. Retrieved from BluePoint Help:
<http://help.bluepoint.uk.com/knowledge-base/logging-into-bluepoint/>

Information Commissioners Office. (2018, May). *Guide to the General Data Protection Regulation*. Retrieved from ICO.: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

Microsoft. (2017, January). *Windows Azure Trust Centre*. Retrieved from Microsoft Azure:
<https://azure.microsoft.com/en-gb/support/trust-center/>