Secure by design

Products

Version 1.0

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Effective date – 28th November 2019

Shelton Development Services Ltd ("SDS" or further referred to as “our” or “we”) is committed to protecting your privacy. This privacy notice ("Notice") explains how we process any Personal Data received as a controller (i.e. what data we collect and what it will be used for) or as a processor (i.e. data which will only be processed by us as agreed with the controller). Listed below will also be the rights you have regarding use, access and correction of your personal data held or processed by us.
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Definitions

The capitalised terms used by us in this Notice which aren't defined, will have the same meaning as defined in any applicable licence agreement and/or software support agreement (“Terms & Conditions”).

Whom does this notice apply to?

This Notice applies to:

1. Entities or individuals who have subscribed to our subscription or support service(s) (“Services(s)”) and have agreed to our Terms & Conditions (“Customer”);
2. the ultimate user of our products being either our Customers’ consumers, employees or contractors (“End Users”); and
3. Individuals (“Individuals”) from whom we collect data as a controller and/or processor as specified below.

Any questions?

If you have any questions or complaints about this notice then please get in contact with us at support@s-d-s.co.uk or call on 01483 278444.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

What personal data does Shelton Development Services Ltd collect and why?

A) Personal data we collect and process for our own purposes: Collected Data

When you visit our website or attend one of our events, we may collect information, which could contain certain personally identifiable information (“Personal Data”), from Individuals as set out below, known as “Collected Data”. For this type of data we will be the controller for all Collected Data as provided under for the General Data Protection Regulation (“GDPR”). As the controller, we will decide what Collected Data (if any) is processed.

When do we process Collected Data?

Sign-Up, Billing and Account Information

When signing up or subscribing up to any of our Services, we may collect information which would be considered Personal Data such as:

1. Contact information such as:
a. Name  
b. Email address  
c. Mailing address  
d. IP address  
e. Phone number of the account admin  

2. Billing information such as:  
a. Credit card number  
b. Billing address  

3. Name and email address when account admin/agent(s) provide feedback from within the Service(s)  

4. Unique identifiers such as:  
a. Username  
b. Account number  
c. Password  

Subject to our Terms & Conditions and this Notice, we will use your data to:  
1. Provide the Service(s)  
2. Send you communications regarding the Service(s)  
3. Determine your business needs or suggest suitable Service(s)  
4. Send you requested information about the Service(s)  
5. Respond to your service requests, questions and concerns  
6. Administer your account  
7. Send you promotional and marketing communications (where you have requested us to do so and you have not since withdrawn your consent)  
8. Facilitate your transactions with other users when you use our Service(s).  

Shelton Development Services Ltd Recruitment  

When applying for a position at SDS via an application form or via an external agency, we may collect:  
1. Contact information  
a. Name  
b. Email address  
c. Mailing address  
d. Phone number  
e. Links to your social networking profiles  
2. Any other information submitted to us via your CV  

Subject to this Notice, we will use such data to determine if the position you applied for is suitable for you or any other position that might be currently open at the time you submit your CV to us (directly or via an agent) or at any later date. Unless you notify us by email at support@s-d-s.co.uk that you wish for your Personal Data to be removed we will retain your data for a period of 1 year from the date on which we received your data. If you wish to update the submitted data at any time, you may do so by contacting us at support@s-d-s.co.uk.  

We will need to evaluate you for the open position, and may internally rate you based on the information you submitted to us. Please note that we do not use any automated decision making or profiling through the use of artificial intelligence or algorithms for this purpose. If you do not wish to be rated by us, please do not submit your application information and/or CV.
Events
When attending one of our events, including webinars and seminars, we may collect certain information from you:

1. Name
2. Email Address
3. Designation
4. Company Name

Subject to this Notice, we will use this information to:

1. Assess the needs of your business to determine or suggest suitable Service(s)
2. Send you requested information about the Service(s)
3. Send you promotional and marketing communications (where you have requested us to do so and you have not since withdrawn your consent)
4. Respond to your questions and concerns

Referrals
Customers may provide us with details of contacts within the service to help with our referrals. The information we may collect:

1. Name
2. Email address
3. Mailing address
4. Phone number

By providing us with this information about any relevant third parties, Customers warrant that they have complied with all the required legal requirements to provide us with this information, this includes obtaining all necessary consents and providing the relevant third party with a copy of this Notice.

If you have been referred to us by one of our Customers, then subject to this Notice we will use your information to:

1. Assess needs of your business to determine or suggest suitable Service(s)
2. Send you promotional and marketing communications (where you have requested us to do so and you have not since withdrawn your consent)
3. Respond to your questions and concerns

Program Registrations and Usage
If you register for any of our programs through a registration form on our website or applications, we may collect certain data from you such as:

1. Name
2. Email address
3. Company name
4. Website URL
5. Company details
6. Location
7. Contact information

Any data collected will be used without limitation to:
1. Facilitate your use of the program portal for which you have registered
2. Send you communications from within the Service(s)
3. Send you requested information about our Service(s)
4. Respond to your requests, questions and concerns
5. Send you promotional and marketing communications (where you have requested us to do so).

Where you use any of our programs, the programs may use data analytics which will automatically collect certain technical and usage information to help us understand how users interact with and use our programs. In addition, we may combine such usage and technical data with your Personal Data that enables us to trace usage to an individual user. We do so, however, only for our own internal business purposes and will not share such combined data with third parties without your consent to do so. Where we do share the usage data with any third parties we will only do so in a manner that will not enable the recipient to identify you personally.

We believe that the above processing is necessary for our legitimate interests as it will help us to define our customer base for certain products and Services, to study how Customers use our products and Services, help keep our programs up to date and assist with developing our business and marketing strategy.

Public Forums, Forums and Newsletters
If you access any of our community forums and blogs or submit any forms on our website, you should be aware that this information you provided may be read, collected and used by others who access them. We may also collect contact information like:

1. Name
2. Email Address
3. Mailing Address
4. Phone number

Also Information about your business:
1. Name
2. Company size
3. Business type

When you actively subscribe to our newsletters, we collect your email address to share our newsletters with you.

Subject to this Notice, we will use this information to:-
1. Assess the needs of your business to determine or suggest suitable Service(s)
2. Send you requested information about the Service(s)
3. Send you promotional and marketing communications (where you have requested us to do so and you have not since withdrawn your consent)
4. Respond to your questions and concerns.

Clear Gifs and Log Files
We as well as our third party advertising partners use technologies that analyse trends, website administration, tracking of users’ around the site / applications, gathering demographic information. From this, we may receive reports based on what these technologies have found from these
companies on an individual and aggregated basis. The technology also logs all movements and changes to software made by Customers in its audit log for that specific application.

Most websites gather certain information automatically and will store this in its log files, this includes:-
1. Internet protocol (IP) addresses
2. Browser type
3. Internet service provider (ISP)
4. Referring/exit pages
5. Operating system
6. Date/time stamp
7. Clickstream data.

Please note that we may also link this automatically collected data to other data (including any Personal Data) we’ve collect about you.

For further information about our use of cookies and similar technologies please refer to paragraph 6 of our website privacy policy (Cookies Policy). Our website privacy policy is available to view at https://s-d-s.co.uk/

Analytics

We automatically receive and record the below when you access our website:
1. Device model
2. IP Address
3. The type of browser being used
4. Usage pattern through cookies and browser settings
5. Query logs and product usage logs.

In order to render user journey at real-time, we also collect
1. Clicks
2. Scrolls
3. Conversion and drop-off on our websites and Service(s)

Subject to this Notice, we will use this information to:
1. Assess the needs of your business to determine or suggest suitable Service(s)
2. Send you requested information about the Service(s)
3. Respond to your customer service requests, questions and concerns
4. Analytical purposes

The purpose for the use of the analytics tools are to:
1. Improve, enhance, support and operate the websites
2. Compile statistical reports and record insights into usage patterns.

Testimonials

Any testimonials/comments or reviews we receive may be posted to our website or used in other material such as marketing, and such data may contain your Personal Data. Prior to such data being used, we will obtain your consent to post this information along with your Personal Data. If you wish to have any of these removed then please contact us at support@s-d-s.co.uk.
Please note that we may use your testimonials/comments in an anonymised format without having to obtain your consent to do so.

Marketing Communications

We may use your email address which has been collected, to send you our newsletter and/or any marketing communications about products and services we provide. Where you have provided consent, we will also send you marketing material about our third party partners. If you wish to opt out of any of these, then you can follow the unsubscribe instructions in the marketing emails, or email us at support@s-d-s.co.uk.

B) Data we process on our Customer’s behalf: Service Data

This includes any Personal Data collected from the End-Users which is collected and processed by their use of the Service(s) or inputted directly by the Customer (“Service Data”). Service Data is submitted to a Customer’s account in connection with Customer’s use of the Service(s), and includes query logs and product usage logs.

We will only process Service Data based on our Customer’s instructions. In such circumstances, we are the data processor and not the controller of the Service Data for the purposes of GDPR. Service Data shall include:

1. Electronic data
2. Text
3. Messages or other materials

We work with all our Customers to provide them with notice as to the purpose of what their End User’s Personal Data is being used for and how it is processed.

We do not own, control or direct the use of Service Data.

We do not own, control or direct the use of Service Data, and only access such information as reasonably necessary to provide the Service(s) (including to respond to support requests), as otherwise authorised by Customers or as required by law. Unless we explicitly agree otherwise in writing, you will not upload any special category personal data (such as health data) on our platform, so that we are not inadvertently processing any special category personal data as defined by the GDPR.

As the controller it will be the Customer’s responsibility to inform the End-Users about the processing procedure, and if required to obtain the necessary consent for any Personal Data that is collected through the Service Data by your use of the Service(s). We are the processor of Personal Data that has come from the Customers, and follow their instructions with respect to the Service Data collected through the Service(s). To protect any Personal Data received our Customers have implemented many technical, physical and administrative measures to prevent unauthorised processing, loss, destruction of, or damage to this data. Please note, however, that we do not assess the nature or effectiveness of the measures implemented by our Customers.
Other Information

When an End-User uses our Service(s), we automatically collect the following information from that user:

1. Device model
2. IP address
3. The type of browser being used
4. Usage pattern through cookies and browser settings
5. Query logs and product usage logs

If you are a user of Freshchat (our website’s online chat function), please note that you will have the option to opt out of tracking certain events from within Freshchat.

Improving and Enhancing our Service(s)

Any Service Data in our systems will be used by us to provide, improve, enhance, support and operate the Service(s) and to help us to develop new products and services and compile statistical reports and record insights into usage patterns.

Single sign-on

You may be able to log in to our applications using sign-in services such as Google, Office365, Facebook Connect and LinkedIn. These services will authenticate your identity and provide you the option to share certain Personal Data with us such as:

1. Name
2. Email address

Services like Google, Facebook Connect, Twitter, LinkedIn also gives you the option to post information about your activities on our applications to your profile page and to share information with others within your network.

Social media features

Our website gives you the ability to post to your social media platforms with social media features such as LinkedIn “Share” button. When interacting with these features, they may:

1. Collect your IP address
2. Collect which page you are visiting on our websites
3. Set a cookie to enable the feature to function properly

All social media features and widgets are hosted by either a third party or hosted directly on our website. When interacting with these features, you are governed by the privacy notice of the company that is providing them to you. Please see our Cookies Policy for further information.

Sharing of personal data

Unless stated in this Notice or our Terms & Conditions, all Personal Data contained in Collected Data and Service Data will not be sold or shared with other companies and organisations for commercial purposes (unless suitability anonymised so as not to be deemed Personal Data in
accordance with the GDPR). Any data collected that is shared with Third Parties may include third-party payment processors who process your credit card and other payment information for us but are otherwise not permitted to store, retain or use such information. However your name, email address and location is something we may disclose with third party service providers so they can reach out to you on our behalf to get feedback from you on our Service(s).

Any Third parties that we use to help provide their Service(s) with whom Service Data may be shared with, are listed here (“Sub-Processors”).

Subject to the Terms & Conditions and this Notice, we have the right to access a Customer’s account and to process Service Data solely to the extent necessary to provide, enhance and improve the Service(s), including, without limitation, in response to Customer’s support requests. Our Sub-Processors will only be given access to Customer’s account and Service Data as is reasonably necessary to provide the Service(s) and will be subject to confidentiality and data protection obligations in their service agreements.

Information that we obtain from third parties

There will be times that we might receive Personal Data about you from third party sources, such as databases and social media. This information will only be used once checked that such third parties have your consent or otherwise legally permitted or required to disclose this information to us.

We receive many types of information from third parties and this may include:

1. Your name
2. Email address
3. Postal address
4. Location
5. Designation
6. Telephone number

This information received will be used to help to maintain and improve our customer support experience, improve the accuracy of the records already held about you, and for any sales and marketing purposes.

How does Shelton Development Services Ltd keep personal data secure?

We make sure the appropriate measures are in place to protect the Personal Data that is collected and processed. These measures make sure that the right level of security is in place to minimise the risk of anything happening to your Personal Data whilst it is being processed. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
Other communications

We will send announcements related to our Service(s) from time to time if we deem it necessary to do so. For example, if one or more of the Services are temporarily down for maintenance, we might send you an email to let you know. These types of communications are something which you can not opt out of as they are not of the promotional nature. However if you wish to not receive them, you may deactivate your account with us or contact us at support@s-d-s.co.uk.

Retention of personal data

If for whatever reason you wish that we no longer collect your data, then please contact us at support@s-d-s.co.uk.

Any data that is collected through Collected Data and Service Data will be retained as long as necessary to comply with our legal obligations, for litigation/defence purposes, maintain accurate financial and other records, resolve disputes, and enforce our agreements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

PLEASE NOTE: In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you and you will not be able to exercise your right to require us to erase any anonymised data. We may also share this anonymised data with other third parties.

Link to Third Party Sites

In places on our website, there will be links to other websites which are not owned or controlled by us. Please be aware that we are not responsible for any privacy practices of these websites or third parties. Always be vigilant when you leave our website via a link and read the privacy policies of each and every website that collects Personal Data.

Children’s personal data

We do not knowingly collect any Personal Data from children under the age of 16. If you are under the age of 16, please do not submit any Personal Data through our website or Service(s). We encourage all parents and guardians to monitor their children’s internet usage and to help enforce this Notice and making sure that their children never provide any Personal Data through their website or Service(s). If any data is submitted then please contact us at support@s-d-s.co.uk and we will make sure to delete any data received immediately from our databases, unless we have are required by law to keep it. Personal Data can be entered into our Products about children under the age of 16, however this is to be entered by the under aged person(s) parents (having obtained consent) and the parents will be deemed the data controller for such Personal Data.
Amendments

Any amendments made to this Notice will be posted to our website: https://s-d-s.co.uk/ and will be effective immediately when posted. If there are any material changes, then we will contact you by email if you are a Customer via the email on your specified account, or via our website if you are not.

If we amend this Notice to make additions, deletions or modifications to the list of cookies from time to time to keep the list of cookies current and accurate we will not notify you.

To make sure you are up to date with this Notice you should frequently visit this URL and check for amendments. With your continued use of the Service(s) following the posting of any amendment, modification, or change to this Notice shall constitute your acceptance of the amendments to this Notice.

You can choose to discontinue use of the Service(s), if you do not accept the terms of this Notice, or any modified version of this Notice.

Legal disclosure

We reserve the right to disclose any Personal Data which it has collected from yourself by applicable law:-

1. in response to any lawful requests from a public authority, meeting national security or law enforcement requirements; and
2. where we believe that it is necessary for us to protect our rights / and or comply with any judicial proceeding, court order, or any other legal process served on us.

Any Collected Data will only be used for activities disclosed in our Terms & Conditions and this Notice.

If we go through any sort of business transition, such as a merger or acquire another company or sell all or part of the business and assets of SDS (including any Customer accounts), Personal Data will be shared (strictly in accordance with the terms of a confidentiality agreement) and will likely be transferred should the business transition complete.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. You have the right to:

**Request access** to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

**Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that in certain circumstances we may not be able to comply with a request to erase your Personal Data but we will provide you with an explanation at the time if the circumstances apply which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:
1. If you want us to establish the data's accuracy.
2. Where our use of the data is unlawful but you do not want us to erase it.
3. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
4. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Contacting Shelton Development Services Ltd

Should you wish to exercise any of your rights set out above or if you have any questions about our security and privacy policies or anything else, like your dealings with us, then please do not hesitate to get in contact with us. You can contact us either via support@s-d-s.co.uk or by telephone 01483 278 444. Alternatively you can send us a letter via post to Shelton Development Services Ltd, Astra House, The Common, Cranleigh, Surrey, GU6 8RZ.
Sub Processors

Sub-processors are any third party business that we engage for performing data processing on our behalf. To remain in line with the GDPR, all of these third party businesses are accountable for protecting any Personal Data processed about an individual. Data protection obligations of sub-processors must be established by legal acts under the Union or Member State Law, or by means of a legal contract. This also enforces that these sub-processors must have appropriate technical and organisational measures in place as specified by the GDPR.

We use the sub-processors (listed below), to help assist us with providing our Services and Products to the End User as described in our Terms & Conditions and this Notice, unless stated elsewhere in a signed agreement with a Customer.

Governance

We only partner with other organisations who like us adhere to global standards and regulations. We always makes sure that the right protection measures, compliance with our security requirements and security audit reports before the close of a contract. Please note that we do not check technical requirements. Initial agreements include review and approval of provision for breach notification in the event of unwarranted data incidents and necessary security measures for data protection.

Data Processing Addendum

We always provide all of our Customers with a data processing addendum ("DPA") which covers their obligations under GDPR. You can find our DPA here. The DPA automatically applies to any processing of EU personal data and means that no additional paperwork is needed in this regard.

We always keep this list up to date and amend it when required, and to keep our Customers informed of the scope of sub-processing associated with our Services.

List of Sub-processor

We utilise both infrastructure and services specific vendors to provide product and services to our Customers and End-Users. The below table is an up-to-date list (as of 24th November 2019) of names and purpose of our sub-processors and 3rd-party vendors.

Infrastructure & Services Sub-processors

Some of our products and services operate on cloud platforms as listed below. We maintain control and access to data hosted on these services, and resides in corresponding data centre facilities based on location or choice (plan) of our Customers. All Data subsequently remains in the data centre unless, shifted to ensure performance and availability of services, or specifically agreed between the Customer and us as per the needs of the Customers. The following table describes the services and purpose for which these infrastructure service providers have been engaged.
To be able to provide specific functionality within our products and services, we partner with third-party services. These entities are sub-processors with access to Service Data (limited to purpose and use of indicated services) and are listed in the table below:

<table>
<thead>
<tr>
<th>Vendor</th>
<th>Purpose</th>
<th>Data Centers</th>
<th>Products / Usage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communigator</td>
<td>Identify, nurture &amp; deliver leads to increase SDS' revenue:</td>
<td>United Kingdom</td>
<td>SDS Website</td>
</tr>
</tbody>
</table>
| Google Cloud Platform         | Secondary cloud infrastructure provider of SDS, data is stored and processed in Google Cloud Platform Data Centers. | United Kingdom                          | SDS Website  
SDS HomeMatch  
Shared Geography Database |
| Google Adwords                | Online advertising platform, where advertisers pay to display brief advertisements, service offerings, product listings, video content, and generate mobile application installs within the Google ad network to web users. | Worldwide                                | SDS Website  
SDS HomeMatch  
SDS Cloud |
| Google Analytics              | Web analytics service offered that tracks and reports website traffic | Worldwide                                | SDS Cloud  
SDS Website  
SDS HomeMatch |
| Amazon Web Services Ltd       | Amazon Web Services is a subsidiary of Amazon that provides on-demand cloud computing platforms to Individuals, companies and governments, on a metered pay-as-you-go basis | United States  
European Economic Area | Shared Geography  
Database  
SDS HomeMatch |
| Amazon S3                     | Amazon S3 or Amazon Simple Storage Service is a "simple storage service" offered by Amazon Web Services that provides object storage through a web service interface. | United States  
European Economic Area | SDS Website  
Shared Geography  
Database  
SDS Home Match |
| Firebase realtime database    | Primary cloud infrastructure provider for SDS, where all SaaS applications are hosted. Almost all data stored, processed and transmitted through SDS products and services resides on Firebase data centers. | European Economic Area                  | SDS Cloud  
SDS HomeMatch  
Shared Geography  
Database |
| Firestore                     | Cloud Firestore is a flexible, scalable database for mobile,             | Worldwide / European                    | SDS Cloud                               |
Data Hosting

We store and process all electronic data, messages or other material submitted to us by our Customers through the Customer's account in connection with the Customer's use of our Service(s) ("Customer Data"). This data is processed in compliance with applicable laws and regulations for the purpose of providing services in our product suite. As a data processor, we perform operations or set of operations on this data in relation to the Service(s).

Data hosting relates to the data stored for the delivery of our services we provide as a data processor and includes data stored for backup. The type of data hosted and processed by us is specified in the table below:-

<table>
<thead>
<tr>
<th>Data</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ticket Data</td>
<td>Information like custom fields, source, tags, attachments, activities in a ticket</td>
</tr>
<tr>
<td>Requestor Data</td>
<td>Any data on requester's email, id, mobile, name, and phone</td>
</tr>
<tr>
<td>Agent / User Data</td>
<td>Includes agent details like name, email, contact, location, group information, and user data like name, company information and custom field data</td>
</tr>
<tr>
<td>Conversations</td>
<td>Agent/User detail, company information, contact data and location, messages</td>
</tr>
<tr>
<td>Social Content</td>
<td>User information like name, email, location and company information</td>
</tr>
<tr>
<td>Application Integration Data</td>
<td>Information related to the relationship, or linking of one data set to another, with one data set typically residing outside SDS</td>
</tr>
<tr>
<td>Knowledge Base Content</td>
<td>Details pertaining to the article topic -- category, company information and access</td>
</tr>
<tr>
<td>Report Data</td>
<td>Company and agent information, and ticket details</td>
</tr>
</tbody>
</table>

The data is hosted with data centres qualified by global IT standards and regulations. We provide multiple locations to host data, which are made available to our Customers upon purchasing a data hosting option as part of the Service(s).

For Customers located in the European Economic Area (EEA), data remains in the EEA by default. However, if Customers choose to use services like 3rd party integrations and apps, custom apps then Personal Data may have to leave the EEA.

Whenever we transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
1. We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission.
2. Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. Please see the DPA section of this Notice.
3. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Backup and logs
We maintain a robust backup plan where data is distributed and stored in secure locations in the respective region. Logs are stored for a period of 1 year in the respective region of hosting, for all the above products.

Shelton Development Services Ltd Cross-Product Authentication
We provide users with identity and access management capability across all our products. Some user authentication and profile data is collected and processed within Amazon Web Services(AWS) and Google Cloud Platform(GCP) environments. These services comply with recommended global security standards, and have the necessary measures instituted for protection of data.

Data Migration
We provide data migration options for Customers for many of our products. As a security measure, while moving services from other vendors to us, we ensure Service Data is contained within the environment of the product. Any migration process is executed on our product via Google Firebase, GCP or on a Customer’s own server.

Integration Data
We have many integrations with our products:-
1. Sequel: QL, Brixx Utility
2. ProVal: Sequel
3. StockProfiler: NA
4. SDS HomeMatch: SDS Sequel
5. Shared Geography Database: