



YOUR WAM SOLUTION & **GDPR**



DEVELOPED BY



FREQUENTLY ASKED QUESTIONS

How will WAM make sure that any personal details are processed in accordance with GDPR?

WAM is a product owned by Halo Leisure Enterprises Ltd. We are registered with the IOC (Information Commissioner's Office) under registration number ZA3591908.

Halo Leisure Enterprises acts as a data processor for its customers through the provision of the WAM software in a "Software as a service" practice.

Personal data such as Name, Telephone numbers, Email Address, Qualifications are protected in secure Tier III certified data centres that are ISO207001 certified and PCI DSS compliant.

Access to your organisation's data is controlled with strict security measures limiting access to authorised users that you choose with the relevant permissions. You also have the ability to remove and lock users accounts. Therefore, ongoing day-to-day management of security of the system sits with our customers, while security of the data remains jointly with Halo Leisure Enterprises Ltd and our IT partners Empresa. All Halo Leisure Enterprise Ltd employees, and Empresa colleagues are trained regularly on information security. Data is only accessed on invitation of the customer and never shared without consent with any third party.

Who are Empresa?

Empresa are our software engineering partners. They are a highly experienced organisation and their day-to-day operations are carried out within a tightly managed Job Management and Ticketing System, ensuring traceability and accessibility for their clients.

How does Halo Leisure Enterprises Ltd parent company fit in?

Halo Leisure Enterprises Ltd is a wholly owned subsidiary of Halo Leisure Services Ltd, a not-for-profit social enterprise. While the employees of both organisations are co-located in the same offices, there is a clearly defined 'firewall' between the operations. Halo Leisure Services Ltd does not have access to YOUR data in WAM.



How will WAM help to enforce a user's right to be forgotten, and also ensure that administrators have the power to destroy out of date data?

Halo Leisure Enterprises Ltd will always offer participating organisations the active functionality to ensure they too remain GDPR compliant. This allows each organisation to adopt its own data retention policy.

If a user leaves an organisation, their account can be locked and deleted immediately. This will prevent any access to the software.

Historic data associated with that user will remain on the system, but personal data will be anonymised, ensuring that the actions undertaken by that user persist for audit purposes. Once anonymised, the user will not be able to be identified, even within the database. Any 'free text' areas completed by the user will not be anonymised, so any names entered by the users will remain.

Should there be a need to permanently delete all of the data, such as an end of a contract, then all data will be erased within seven days, along with the backups and cloud storage. Once erased, the data will no longer be recoverable.

How will WAM maintain physical security at its locations?

The WAM system is hosted within a secure UK data centre. Access to the server is restricted both physically and logically and it is placed behind a Cisco firewall for additional security. The attachments uploaded to WAM are stored within a UK based secure cloud storage facility and are locked down with multiple levels of logical security, such as expiring URL's, complex passwords and access control lists.

In addition to this both Halo Leisure Enterprises and Empresa have access control systems in place as well as identifying and remedying physical security risk assessments which include fire, flood, business continuity and utilities resilience.

Halo Leisure Enterprises Ltd operate a "clear desk policy" to ensure that no personal data is encouraged to be held within its offices.

How will WAM help me to control my data securely?

Access to each customer's instance of WAM is through user name and password entry. You set these for yourself as and when you add a new user. The user also has the capability to change their password, to one of their own choosing at any time.

All web traffic sent to and received from WAM, is transmitted securely using an SSL certificate, utilising 256bit encryption. The WAM system utilises a separate database per client, ensuring that there is no risk of data being transferred from one client to another.

How will WAM ensure the reliability of its employees who access to personal data?

All colleagues who are supporting the WAM system receive regular training and guidance on good practice and on secure destruction of data when not required. We also operate a "clear desk" policy so that there is no personal data remaining on a person's desk at the end of the day.

Any personal details that are required to be kept, for example with reference to invoicing, sales and to deliver customer service, are secured under lock and key at the end of each day. Access to this information is for Halo Leisure Enterprises Ltd only.

Are annual independent reviews of Data Protection and Security undertaken?

Yes - We take the subject of your data very seriously. Both Empresa and Halo carry out reviews and appropriate data protection impact assessments.



How will you ensure the systems comply with the principle of “Data Protection by Design”, so it promotes security and data compliance throughout the whole process?

WAM was designed with data privacy in mind and was fully compliant with all previous legislation. Changes to align with GDPR have been minimal.

Good practices and training throughout the year ensure that compliance and the ability to react if required is paramount. Varied periodic assessments ensure that the infrastructure of WAM and the free downloadable ‘app’ is kept up to date with the latest operating system to ensure all devices receive the latest security patches.

Our partners Empresa, have in place a monitoring system, to observe and react quickly to any changes, and two act authentication security for access to key infrastructure services.

Can users ask what information is held on them?

Yes - in fact the user can see how they have been set up on WAM and the data that is held on them at any time. With regards to personal information WAM asks for Name, Email, Contact Number and the optional ability to record qualifications. The user can see and amend their own data at any time. Any other details stored about the user apply to their use of the WAM tools. These tools are accessed via a permission to do so being granted. As long as the permission remains, the user can access all material that applies to them.

Is data stored within the European Economic Area?

Halo Leisure Enterprises can confirm that no WAM data is transferred outside the European Economic Area in its data processing activities.

If there is a client who belongs outside the EEA, then data will still be processed by Halo Leisure Services Ltd and Empresa within the EEA.

This applies to backups and archives too.

Can you suggest how WAM can meet the consent mechanisms within the GDPR?

We encourage clients to ensure that within their own GDPR compliances that they get consent from colleagues to hold their data within the WAM system.

WAM data will never be used by Halo Leisure Enterprises Ltd or Empresa to market additional products and service.

Will any GDPR remedies and solutions be applied to WAM at no cost to customer?

Yes - Halo Leisure Enterprises Ltd is committed to ensuring that compliance is met and security of data is ongoing. Many of these seamless solutions may pass unnoticed, as we will be updated and effective before the 25th May 2018 deadline.



For further guidance visit:

www.ico.org.uk

www.maxyourassets.com

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