The information contained on this page is for general guidance purposes only. It should not be taken for, nor is it intended as, legal advice. We would advise customers to seek their own legal advice if they are unsure about the implications of the GDPR on their businesses.

1. Introduction

This document is intended to assist you with you GDPR compliance requirements by explaining what type of data is typically processed by users of Spindle Self Serve and how that data is processed by you as a "Controller" of that personal data. This will assist you with ensuring your records are compliant with GDPR. Draycir are neither the Controller nor Processor of any personal data held in Spindle Self Serve.

Should you have any questions that cannot be clarified within this document please contact our Support Desk via email on support@draycir.com.

2. The purposes of your processing

As a Controller it is up to you to determine the purpose for which you are processing personal data but Spindle Self Serve is typically used for the following purposes:

- The provision and management of financial and accounting information;
- The provision and management of customer account information;
- The provision of services to assist with marketing to existing customers.

3. A description of the categories of individuals and categories of personal data

Spindle Self Serve is designed to hold data on the following categories of individuals:

- Customers
- Suppliers

Spindle Self Serve has the ability to hold the following categories of personal data:

- **Account identification data** - such as: first name, last name, email address and user ID – note, the User ID is automatically generated and assigned to every user within the database, but is not visible on the software. This information is the minimum level required in order to ensure that Spindle Self Serve is able to track and record the activities within the software.
- **System Audit** – Logs all activities within the software and can be viewed by a System Administrator at any time.
- **Order History** – The Invoice Messages allows customers to informally communicate with suppliers within the software. For each message entry the user's name (First & Last name) is displayed in order to identify the interacting user.
- **User Management** – Captures all user details that require and have access to Spindle Self Serve.

4. Recipients of personal data

Spindle Self Serve is a self-contained software, therefore personal data is not automatically shared with any organisation other than the licensed user of the software. Where you invite your customers to access the software each customer will only be able to view its own data and no other customer data.

5. Data Transfers outside the EU

Spindle Self Serve does not automatically transfer any data outside the EU unless you specifically choose to send that data to a third party located outside the EU.

6. Retention schedules

Spindle Self Serve by default logs all activities within the software and retains this information for your security and auditing purposes. Currently there is no automated scheduling in place to delete or purge personal data, however there is the ability for this to be done manually if required. Therefore you should determine the retention period that is appropriate to your circumstances and apply these accordingly.

7. Technical and organisational security measures

Spindle Self Serve is installed on your systems and therefore overall security measures are as per your general information security policies. However, please note that the software is set to enforce the use of SSL certificates and passwords are encrypted, where each user password has a unique encryption.