

GDPR Statement of Compliance

CR Systems are registered on the UK Data Protection register ZA066642

General summary

We process data specifically for our clients' internal use. We do not process or share any of our clients' data for any other purpose or with any other source unless directed by the client. We hold very little personal data, usually the minimum level in terms of sensitivity.

Data Sensitivity

The level of personal data that we need to maintain our service is generally considered to be among the lowest of categories in terms of sensitivity. To be specific we hold:

Core Data (360° Feedback only. Opinion based surveys this data is optional)

- Individual name
- Individual email address
- Working relationship to some other members of the client organisation
- Raw scores and written feedback

Optional Data (depending entirely on client requirement)

- Department
- Grade
- Location
- Other demographics as defined by client need

Data Location and Security

We hold the data on secure, encrypted databases within the UK.

The data is duplicated in geographically separate locations and replicated in real time to ensure the fastest possible restoration of availability in cases of significant breakdown.

The client has the option to define and locate the data servers to wherever they wish based on their operational requirements.

Raw data and processed data (360 Reports etc) are held on separate databases.

Data is exported only to those countries specifically requested by the client as part of their operating remit.

Data Retention

Processed data is deleted automatically after use. Report files (pdf files) that are generated from the processed data are either deleted immediately after delivery unless specifically requested by the client.

Raw data is held for a period of 12 months on our operational servers, and then archived for a time period agreed with the client but no longer than seven years.

Our default position is to delete any reports/analysis immediately from our database upon delivery to the client. The raw data is kept for 12 months and then deleted.

Data Consent

The data collected is assumed to be authorised by the individual as part of the contract of employment between the individual and the client. It is the clients' responsibility to inform the individual how their data will be used (different clients' use the data in different ways).

In addition we can support this by adding an option (client decision) for each individual to be informed both online and in any correspondence of the use of their data and then given the option to actively opt in to the process before providing any data.

Data Profiling

It is a mute point as to whether 360° Feedback is a form of Data Profiling. It does not predict any future behaviours from the individual concerned, and in terms of analysis it simply reports and compares the views of others.

It should always be remembered that 360° Feedback has very limited validity and reliability beyond its Face Validity. It is therefore the responsibility of the client to manage appropriately any data profiling processes that may ensue from the collection and analysis of the data.

In opinion based surveys there is a greater degree of profiling, however all personal data is always agglomerated and minimum levels of display are agreed with the client to protect the anonymity and confidentiality of the individual personal data involved

Training

All our staff are trained twice a year and are aware of their responsibility in terms of individual data protection and the processes we use to protect both individual and corporate data. As from April 2018 the training will specifically include a GDPR update section so that staff are kept updated of any material changes in their obligation to the protection of our clients' and their employees' personal data.

Data Controllers and Processors

The Data Protection Officer (DPO) for CR Systems is the Managing Director. All Data Processors are vetted by either the DPO or appointed Data Controller who also takes responsibility for all training of Data Processors.