collsoft

Privacy Policy

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As a software company, CollSoft Ltd (hereafter referred to as 'CollSoft') holds the security required to safeguard customer data in high regard.

On a continual basis, we audit and implement improvements to our IT infrastructure, service provision and data storage. While GDPR may be implemented from May 2018, data security has been part of our development for much longer.

1. CollSoft Privacy Policy

We, at CollSoft, fully respect the customers right to privacy in relation to their interaction with our company, website and services provided, therefore we actively clarify and provide transparency in our dealings with each customer to what information we will collect and how we will use this information.

We only collect and use individual user details where we have legitimate business reasons, and where we are legally entitled, to do so.

1.1 Who we are

1.1.1 CollSoft Ltd is a company incorporated to develop financial software, with a registered address of Rockfield House, Donaghmore, Navan, Co. Meath [Company Number: 335880]. All operations are carried out at our business address of Johnstown Village, Navan, Co. Meath.

1.1.2 Our agreement with each customer (together with any terms and conditions of a software license provided and any other documents referred to within our policies) sets out the basis on which any personal data we collect, or that is provided to us, will be processed by us, including the data collected in relation to license agreements and sales transactions entered into.

1.2 How we collect information from customers

1.2.1 We will collect information from a customer if they register to use our website, register to obtain a free 30-day licence key or enter into a paid licence agreement; this information will include the company name, personal name, telephone number and Email address.

1.2.2 We may ask for additional information about the customer business and preferences on a voluntary basis; placing an order for products or services on our website, this will include a contact name (including business name), address, contact details (including telephone number and Email address); complete online forms (including call-back requests); take part in surveys; enter any competitions or prize draws; download information such as white papers or other publications; or participate in any other interactive areas that appear on our website or which we offer from time to time; provide contact details to us when registering to use or accessing any product or service we provide (including any Apps we may offer); and contact us offline for example by telephone, fax, Email or post.

1.2.3 We will collect information if, when operating our software, an order is placed from within the software, a software update is downloaded, or our servers are used to process an Email request (such as payslips/P60s). The collection of information for these activities is necessary to complete each user initiated transaction.

1.2.4 We also collect information about visits to our website, or use of our products or services, using cookies or similar technologies to analyse visitor behaviour and is strictly for analytical purposes only and, in most cases, would not directly identify the individual as the source. Details collected are, but not limited to, traffic data, location data, knowledgebase activity, and other resources that be accessed.

1.3 Uses made of the information collected

We use information held about customers in the following ways:

1.3.1 To process the purchase of an annual CollSoft Payroll software licence.

1.3.2 To notify customers of software updates and new releases.

1.3.3 To advise of important legislative and regulatory changes that will affect customers.

1.3.4 To ensure that content from CollSoft is presented in the most effective manner.

1.3.5 To provide information about products or services that is requested from us.

1.3.6 To provide information regarding our other products or services, such as updates, which we feel may interest customers. We may use customer provided Email addresses for this purpose.

1.3.7 To deliver and maintain a high-quality service.

1.3.8 To allow access to the CollSoft website and to participate in interactive features of our service, when a customer chooses to do so.

1.3.9 To notify customers about changes to CollSoft products or services or to the CollSoft website.

1.3.10 We may use contact details for feedback on the use of our software and/or services and/or website.

1.3.11 We may use aggregated data about users of our site, sales patterns and other statistical data to improve our site, but it will not be possible to identify individuals from that aggregated data.

1.3.12 Telephone calls are recorded for quality control and training purposes. All calls are paused when a customer is providing credit/debit card information for the purposes of making a payment to CollSoft.

1.3.13 CollSoft will never share customer information held with third parties, unless legally obliged to do so.

1.4 Security and storage of information and retention periods

1.4.1 We keep customer information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. Operating a 'paperless' office, all information is held digitally with no paper record of transactions or customer details.

1.4.2 Unfortunately, the transmission of information via the Internet is not completely secure. We have security policies and infrastructure in place to do our best to protect customer data. We use domestic located data-service providers with optimum firewall facilities and monitoring services, to maximise the level of security for all data repositories and servers, including customer offered Email server facilities. (refer to Section *2. CollSoft IT Infrastructure* for further information).

1.4.3 Once we have received customer information, we will use strict procedures and security features to try to prevent unauthorised access.

1.4.4 We will store customer information at least for the duration of any customer relationship entered into, or as otherwise required by law (normally up to a maximum of 6 years for Revenue Commissioner purposes).

1.4.5 Where a customer relationship has ceased we will delete any email addresses and telephone numbers from the customer's record 12 months after the cessation of the relationship. Basic contact details (name and address) along with financial records will be retained for 6 years for audit/accounting purposes.

1.4.6 Customer accounts containing no financial transactions will be entirely deleted from our systems after 12 months. Typically this would be where a prospective customer ordered a demonstration CD from CollSoft but never actually went on to purchase the software.

1.4.7 In line with standard industry practices CollSoft creates regular backups of all data as part of our disaster recovery procedures. CollSoft retains backups for a period of 30 days. Any data deleted from our live systems will continue to exist in our backup sets for a period of 30 days. CollSoft does not use any third parties for the handling or storage of backups. All backups are retained on systems wholly owned by CollSoft. All backups are encrypted.

1.5 Disclosure and sharing of customer information to third parties

1.5.1 All online orders are processed using an online terminal service provider, Realex, a PCI certified provider. All transactions are 3D secure enabled to maximise security for the completion of the transaction. For the purpose of completing the transaction, customer credit card details are entered onto a Realex web-interface for processing. This information is shared with Realex to the extent that it is required to complete the transaction. Customers may opt to end the transaction at any time, prior to completion, by simply closing the webpage. Alternative payment options are available (i.e. cheque payment, cash and bank transfer)

1.5.2 We will never share customer information with any other organisation except in the following circumstances:

- with another organisation to which we transfer, or are in discussions to transfer, our rights and obligations under our customer agreement.
- with another organisation that buys our company or our assets, or with another organisation from which we acquire a company or business, and during any preceding negotiations with that organisation, which may or may not lead to a sale.
- with our professional advisers who have a reasonable need to see it to execute their services.
- to legal authorities if asked to do so, or to a third party in the context of actual or threatened legal proceedings or if otherwise required to do so by law.

1.6 IP Addresses and Cookies

1.6.1 We collect information about a customer computer, including (where available) the IP address, alphanumeric IDs and operating system. This is used to allow the user to control the distribution of the licence across various users and to control unauthorised use of the licence.

1.6.2 We may collect information regarding the volume and status of data transmission, click-through statistics, the name of the domain and host from which you access the internet and the date and time you access portions of the CollSoft website, for system administration and statistical purposes. This is statistical data about our users' browsing actions and patterns, and does not specifically identify an individual.

1.6.3 For the same reason as above, we sometimes store small data files called cookies in web visitor browsers, for a specific period. This enables us to identify general user behavior and improve the user experience when visiting our website and to also improve website content. This facilitates the collection of statistical data, and in each instance, does not specifically identify an individual.

1.6.4 The data collected through the cookies may include:

- Web browser used
- User Operating system
- Web pages visited
- Content viewed
- User behaviour during a visit
- Time of visit
- Duration of visit
- Sale conversion

1.6.5 Data collected is top level information, for the sole purpose of visitor analytics, and does not contain any personal information. We do not place cookies on behalf of third parties, and at no time is any of the data collected shared with third parties.

1.6.6 Web visitors can disable all/specific installed cookies at any time through their browser settings.

1.7 Customer Rights

1.7.1 Customers have a right to rectify any errors in information we hold about them, and to change or correct any details already given us. Amendments may be notified by Emailing *compliance@collsoft.ie*.

1.7.2 Customers have a right to be removed from any mailing list we hold at any time. Unsubscribe options are offered in all Email communications, alternatively customers may unsubscribe by Emailing their request to *compliance@collsoft.ie*

1.7.3 Customers may request a copy of their personal data record that is held by us. Requests must be submitted in writing to our postal address of by Emailing *compliance@collsoft.ie*.

2. CollSoft IT Infrastructure

2.1 Hardware Infrastructure Upgrade

As part of our GDPR due diligence we evaluated our IT department and embarked on a major project of renewal to upgrade all servers throughout Q1 and Q2 2017.

2.2 Data Centre

For CollSoft, building a robust environment in which to host our new IT infrastructure is a priority, it is for this reason we have engaged the services of a Data Centre.

A purpose-built Data Centre offers the best solution to security, resilience, higher functioning communications infrastructure delivering 99.999% network availability and uninterrupted power supply.

Throughout 2017, CollSoft will transition from our internal servers to our replacement network which will operate from this single dedicated Dublin based Data Centre. Offering maximum reliability this world class, custom designed Tier 3 data facility is ISO accredited (ISO 9001, ISO 27001, ISO 20000).

On-site engineers provide true 24x7x365 monitoring on all our servers with support. Our contract agreement guarantees that security and IT personnel are present 100% of the time. Any network breach will be identified immediately and resolved without delay.

At CollSoft, we do not share with, rent or license server space or hosted services from any third-party service provider. All servers have been purchased by CollSoft and remain wholly owned by CollSoft, the engagement with a Data Centre is a move to a secure physical location and monitored environment to minimise risk and exposure.

100% transition to the new server network in the Data Centre was completed in Q4 2017.

2.3 Managed Firewall

CollSoft has operated successfully without a data breach or intrusion to date, in 2017 internal infrastructure audit resulted in the upgrade to a managed firewall solution.

A proactively managed solution will ensure that it is constantly up to date and we will be actively notified of any potential threats directed against our network (and blocked). Early detection and the proactive response of this solution will minimize the associated risk and disruption to CollSoft servers.

2.4 Guaranteed location

CollSoft do not share with, rent or license server space from any third-party service provider. Therefore, all data is collected, processed and retained (where necessary) on our wholly owned Dublin based servers. This applies also to all services offered, and to all customer support communications also.

3. Customer Transactions

3.1 Web Visitors

Q2 2018 will see the launch of a new CollSoft website. All customer details exchanged on the new website will only communicate with our wholly owned servers.

3.2 Sales Transactions

All credit card transactions are processed using an online terminal service provider, Realex, a PCI certified provider. For the purpose of completing the transaction, customer credit card details are entered onto a Realex web-interface for processing. This information is shared with Realex to the extent that it is required to complete the transaction.

Online Orders
All online transactions are 3D secure enabled to maximise security for the completion of the transaction. This ensures that the credit card used is held by authorised users only. Customers may opt to end the transaction at any time, prior to completion, by simply closing the webpage. Alternative payment options are available (i.e. cheque payment, cash and bank transfer).

Telephone Orders
Where telephone orders are placed, telephone call recording is paused during the exchange of credit card information.

No paper record of credit card details is created at any point of the transaction.

4. CollSoft Payroll

4.1 File Structure

To minimise the data available each edition of CollSoft Payroll operates from its own application with its own dedicated Database. Each Database is protected with an encrypted password.

Payroll backup files are encoded so that they are only compatible with CollSoft Payroll. The file backup facility will allow the end user to determine when backups are taken, and to which location, allowing them to choose the required secure location to store them.

Each payroll data file, for it's very purpose, contains Personal Data which can be used to directly or indirectly to identify a person, ranging from a name, address, email address and bank details. Additional encryption was developed and implemented in the initial version of CollSoft Payroll 2018 which secures these personal data fields adding an extra layer of security to the dataset.

4.2 Hosting Data

As a software development company, we have designed the payroll database with security in mind, an encrypted password database reduces risk but further measures are required at operative level.

As a customer hosted solution, customers are strongly advised to operate the payroll database from a secure platform.

4.3 Software controls for the end user

Each payroll company offers a password level of security to restrict user access.

4.4 Email Payslip service

Email service eliminates the requirement for payslip/P60 printing. CollSoft offers an Email server for customer use to deliver payslips and P60s to employees. This service is provided using a CollSoft, wholly owned and controlled, dedicated Email server;

- Validates request
- Queues request
- Delivers request
- Deletes file messages and attachments

This dedicated server resides in a secure data centre with 24 hour monitoring.

4.5 CollSoft Support

All customer queries received by our helpdesk are deleted on a periodical basis.

Any file attachments which customers choose to submit to us are permanently deleted from our helpdesk and servers routinely. This is a process, while minimised, will see significant reform during 2018.

To minimise the transfer of data, we offer the option of a remote desktop log-in facility, which the user controls the uptime link to, this eliminates any requirement to transmit a set of data for additional payroll support.

5. EU General Data Protection Regulation (GDPR)

2018 will see an increase of awareness by our customers, when we are collecting data, what data we are collecting and what it will be used for. In accordance with our current policies, the data collected will be minimal and, for the most part, is only the detail required to issue an invoice and license key. Thereafter, contact details may be used for direct marketing and customer support purposes.

At all stages customers will have the option to opt out of contact arrangements, however certain details are a necessity to complete the issue of a software license key. In such cases, the customer must evaluate whether to enter into a license arrangement with CollSoft. (Refer to Section *1. CollSoft Privacy Policy* for further information)

Local security measures are key. CollSoft Payroll is a customer hosted solution, and as such, customers are advised to operate the payroll from a secure platform with the necessary local controls implemented to protect all applications operating onsite.

Customer will be notified of in-year upgrades throughout 2018, as we continue to redesign software features. These will be communicated to all customers throughout 2018.

6. 2018 Product Development

2018 will see continued assessment and development to meet an ever-growing threat to data.

CollSoft policies and procedures, as well as product design and development, will continue to prioritize data security and management, not just for CollSoft as a company and as a service provider, but also in the solutions we offer to customers.

CollSoft Payroll will see significant changes during 2018, all of which will endeavour to comply with both data protection requirements while also preparing for statutory compliance to PAYE Modernisation which is effective from 01st January 2019.