

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 your GDPR compliance requirements by explaining what type of data is typically processed by users of Spindle Document Distribution (SDD) 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 direct Processor of any personal data held in Spindle Document Distribution.

If you are using the “PayThem” feature, this will allow you to link your invoices to a third party payment provider (Payment Provider) in accordance with the separate terms of service. In order for the Payment Provider to provide that service to you Draycir will need to process some data (outside of SDD) to generate the payment link. The Payment Provider is a Processor of any of your personal data provided in connection with that service and Draycir is a Sub-Processor to the Payment Provider.

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 Document Distribution is typically used for the following purposes:

- The provision and management of financial and accounting information;
- The provisioning of PayThem links via payment service providers.

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

Spindle Document Distribution has the ability to hold the following categories of personal data:

- **Account identification data** – such as: username and password. This information is required in order to securely access the Spindle Document Distribution Tools.
- **User Settings** – Ability to add/edit the current list of users and configure users default; email, fax and CRM device, when distributing documents.
- **Email Settings** – Can specify the recipients of the email and override the sender’s details.
- **Fax Settings** – Can specify the recipients of the fax and override the sender’s details.
- **Audit Logs** – Captures all activities within the software when distributing documents. The default setting overwrites the audit logs each time a document is distributed, however there is the ability to disable this feature so that the logs are recorded for every distributed document.
- **PayThem** – Spindle Document Distribution provides the facility for end users to add a clickable button on the generated invoice, and it has the ability to generate a URL in the corresponding email to allow customers to pay invoices using a Payment Provider such as; Sage Pay (UK), WorldPay & PAYA (Formerly Sage Pay USA).

4. Recipients of personal data

Spindle Document Distribution is a self-contained software application, therefore personal data is not automatically shared with any organisation other than the licensed user of the software.

As described above you may decide to share personal data with the Payment Provider via the PayThem function.

5. Data Transfers outside the EU

Spindle Document Distribution 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.

The Payment Provider may transfer data outside of the EU in providing the PayThem function to you. Please check their applicable service terms or privacy notices.

6. Retention schedules

Spindle Document Distribution only stores the personal data identified in Section 3 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.

In respect of the PayThem function, Spindle Document Distribution will store the transaction level information in order to securely send this information to the Payment Provider to allow customers to make payments online. The Payment Provider does not communicate back to Spindle Document Distribution to confirm whether an invoice has been paid or not, therefore this transaction information is retained allowing customers to access the payment links at any time.

7. Technical and organisational security measures

Spindle Document Distribution 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 secure encryption of all user passwords as well as all connection strings so that any application interacting with Spindle Document Distribution is authorised to do so. For PayThem the transactional information that is held is securely encrypted so that the data being transferred to the Payment Provider cannot be intercepted and misused. Please refer to the Payment Provider's service terms or privacy notices for details on what security measures are taken by the Payment Provider.



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