

RPAS Portal Privacy Notice

Last updated: 18/05/2018

1. Phixos Limited (“us”, “we” or “our”) understand that your privacy is important to our users (“you” or “your”). We may process your personal data in our capacity as a data controller for legitimate purposes as described in this Privacy notice.
2. The General Data Protection Regulation (GDPR) describes Personal Data (data) as any information relating to a natural person who can be directly or indirectly identified in particular by reference to an identifier. The personal data we collect relates to any data you provide, or is produced through use of the service, and includes, but is not limited to, your name and your email address. In using RPAS Portal, you may provide additional personal data through the record and planning features. Sensitive personal data is data which is described in Article 9 of GDPR. We will not collect sensitive data.
3. By utilising this service, you are entering a contract for its use, and as such data you provide will be used by us to deliver the service as described in this privacy notice. This data is only made available to our staff on a need to know basis that require access to deliver the service. You should be aware that the consequence of not accepting this use of your data will prevent us from being able to provide this service for your use. To more fully understand your rights relating to your personal data, please refer to paragraph 7, “Your rights as a Data Subject”
4. We will process your personal data in accordance with this privacy notice, unless such processing conflicts with the requirements of applicable law, in which case, applicable law will prevail, in which case we will notify you of such.

The data is stored on secure servers and is maintained by us, utilising the necessary technical and organisational measures to ensure your data is stored securely. The personal data you provide will be used to ensure access to the service and facilitate the use of its features.

5. If you continue, then your personal data will be processed as follows:
 - a. Your personal data will be stored on a secure server which has access limited to members of the administration team.
 - b. Your data, and data generated by the processing of the service, will be used in reports and feedback provided to you in order to satisfy the purpose of the system. No automated decision making is performed by the tool that could have consequences for you.
 - c. Your personal data will be retained securely in the server for up to 12 months after your last use of the system or after the end of your paid subscription whichever is later, allowing you to resume usage in this period. After this period, your data will be removed or anonymised as required for the service performance.
6. Under article 5 of GDPR personal data shall be:
 - a. Processed lawfully - The lawful basis for processing your data is through the contract established by the use of this service as described in para 3 of this notice.
 - b. Collected for explicit specified purposes - These purposes are for the correct operation of the supplied service.

- c. Adequate, relevant and limited - All data we collect from you forms a necessary part of the service provided.
 - d. Accurate and kept up to date - The data we process is supplied by you and you are responsible for its accuracy. Any changes to the supplied data can be undertaken through the appropriate features/interfaces of the service.
 - e. Personal data will be kept for no longer than necessary - Personal data is retained for 12 months as detailed in para 5.
 - f. Processed in a manner that ensures security of data - Data is stored on secure servers within the EU. The data is only accessible by administration persons involved in the service. Technical and organisational measures are in place to ensure this security.
7. Your rights as a data subject - At any point while we are in possession of or processing your personal data, you have the following rights:
- a. Right of access - you have the right to request a copy of the information that we hold about you.
 - b. Right of rectification - you have a right to correct data that we hold about you that is inaccurate or incomplete. See para 6d.
 - c. Right to be forgotten - in certain circumstances you can ask for the data we hold about you to be erased from our records. This will be done provided there is no legal reason that we have to retain the data. If there is we will notify you of the reasons why and give you a date when your data will be removed.
 - d. Right to object - you have the right to object to certain types of processing such as direct marketing.

If you wish to legitimately exercise any of your rights under GDPR, please contact the Phixos Data Protection Officer using data@phixos.co.uk.