



# PS Financials GDPR

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# PS Financials - Data Protection & GDPR

## 1. Introduction

- PS Financials in this document refers to a suite of software modules and databases used for the provision of an Accounting, Ordering, Expenses and Timesheet system. The software is provided exclusively by PS Financials Ltd, who are the authors. There are other PS Financials Ltd products which are the subject of other GDPR documents.
- PS Financials is run by customers either in their own 'on premise' installation or in the PS Cloud environment. In both cases PS Financials is a processor of data. In the PS Cloud environment PS Financials maintains the software and backups of the databases. In on premise installations this is the responsibility of the customer.
- Three sample configurations of PS Financials data, termed the Standard Models, are provided to customers. But customers are also able to add their own local data items to capture data specific to their business. This may include personal information.
- PS Financials Ltd is an organisation with a strong background in the development and application of software technology to provide solutions in a wide variety of sectors. PS Financials is currently used by over 4,500 clients in the Education, Commercial and Charity sectors
- PS Cloud is externally hosted and accessed via an internet connection. PS Financials is operated from a secure server operating under a Secure Sockets Layer (SSL) that helps to protect data by using Transport Layer Security to encrypt data. The system also incorporates a rigorous security protocol that restricts access to the logged in area. The system can only be accessed by authorised personnel, via a User Name and Password
- PS Financials Ltd is registered under the Data Protection Act 1998 (Registration Number: Z6413626) and is fully compliant with the GDPR. Strict adherence to the General Data Protection (GDPR) contained therein is integral to our business operations. Data Protection is intrinsic to all our operations and, as such, we ensure that all our procedures are robust and comprehensive. Every possible effort is exerted to maintain data integrity.
- **PS Financials Ltd Data Protection Officer can be contacted at :**  
[DataProtectionOfficer@PSFinancials.com](mailto:DataProtectionOfficer@PSFinancials.com)
- The following guide will answer more specific data protection queries but if you have any more questions please call the Helpdesk team on 01733 367 330

## 2. Data Access Policy

- **PS Financials** users are divided into two groups **PS Financials Ltd Employees** and **Customer Users**

### **PS Financials Ltd Employees**

- For on premise customers, the access to their systems by PS staff is purely at the discretion of the customer, who will provide user passwords and login details. Access is typically through remote monitoring software such as the 'GoToAssist' software, where the customer can view the activity being undertaken.
- For PS Cloud, PS employees are given limited access rights for the PS Financials system based upon their operational requirements. Support, system building and consultant staff have full administration rights to the cloud systems. Project managers and Trainers have equivalent access to the cloud system as the customer i.e. they can only change data through the software applications. A two-step approach to login is adopted, whereby a PIN number must also be input during a login to a PS Cloud system. The PIN is referenced from a separate system and changes daily.
- All staff access is fully logged and monitored regularly - allowing a clear audit trail, and exact usage information
- Each PS employee uses a secure login and password for the PS Financials Ltd internal systems and network. Employees use these identities and passwords in keeping with secure practices (passwords are not compromised by sharing)
- Employees are educated on matters of security and integrity, and the confidentiality of information
- Relevant user IDs and passwords are disabled on leaving the company's employment
- Employees access levels are reviewed on a regularly basis
- All paper-based sensitive information is disposed of by shredding
- Laptops and mobile devices used by members of staff that work outside of the office environment and on customer sites are all encrypted. Laptop hard drives are fully encrypted using Bitlocker which uses AES encryption. Smartphones and tablet devices are all password protected and use built in encryption where available.

### **Customer Users**

- When setting up the customer account, the system creates a secure password-based user account
- Customers will subsequently set up their own new/additional user accounts
- These user accounts can be controlled via the **PS Financials** settings section, where customers can choose the areas of the system to which each user has access. Access to the security settings can also be restricted
- Functionality exists to expire user passwords after a specified time, which a customer can set against user groups, if they wish. A Regular Expression can be created to force users to meet specific format requirements when changing passwords.
- On premise customers control the users' access mechanism to their databases.

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- PS Cloud customers access their databases through Remote Desktop connections but can also connect directly through their desktop browsers to https secured sites for the web browser applications. Users are not blocked after log in failures but need to wait for fifteen minutes for an automatic reset after 3 failed attempts. An audit trail of login failures is maintained.
- For Forgotten passwords, PS Cloud customers can contact PS Support for assistance. For customers running their own installations the password reset is the responsibility of their system administrator.
- Customer Administrators are responsible for the removal of user accounts after staff leave the school.

## 3. Data Processing

Service Data is any information, including personal data, which is stored in or transmitted via the PS Financials Ltd services, by, or on behalf of, our Customers

From a privacy perspective, the Customer is the controller of Service Data, and PS Financials Ltd is a processor. This means that throughout the time that a Customer subscribes to services with PS Financials Ltd, the Customer retains ownership of and control over Service Data in its account.

PS Financials Ltd uses Service Data to operate and improve our services, help Customers access and use the services, respond to Customer inquiries, and send communication related to the services.

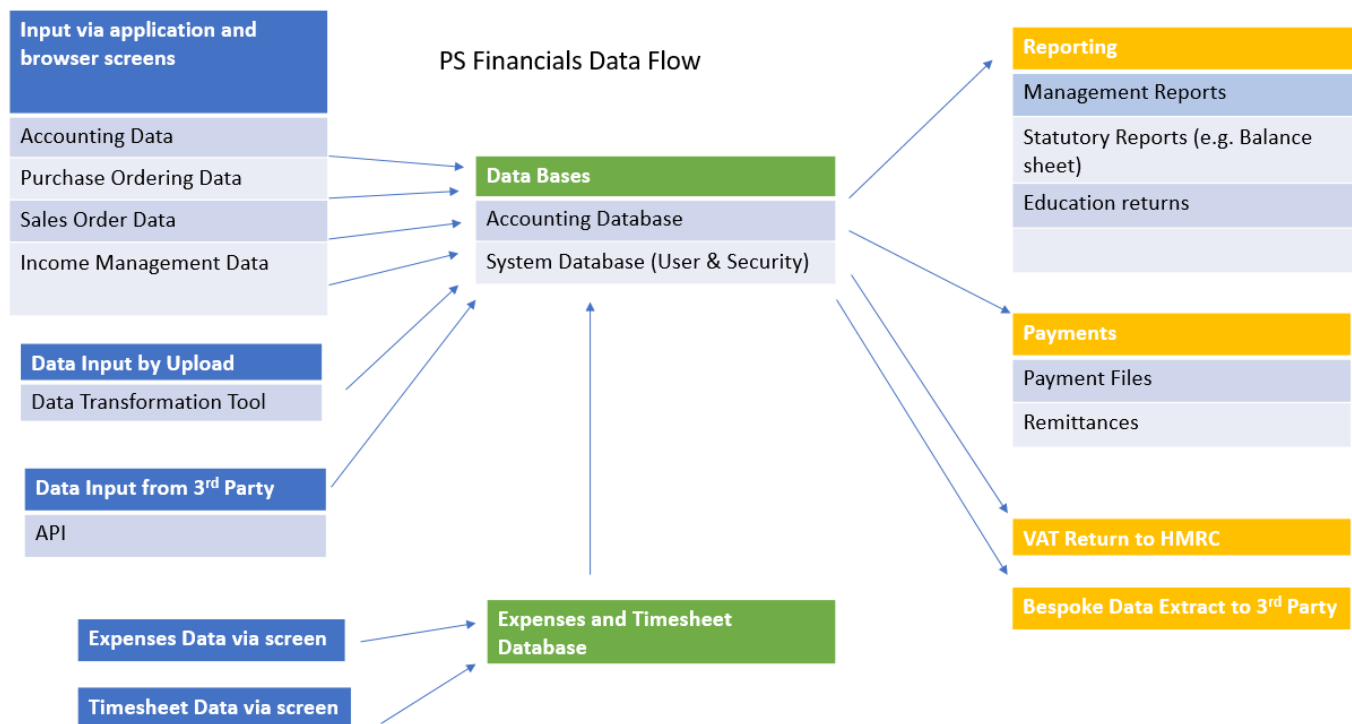
PS Financials Ltd prioritises data security and combines enterprise-class security features with comprehensive audits of our applications, systems, and networks to ensure Customer and business data is always protected. For example, PS Financials Ltd servers are hosted at Tier III ISO 27001 compliant facilities.

Additionally, we engage third-party security experts to perform detailed penetration tests on a periodic basis, and our Support team is available to respond to security alerts and events

## 4. Key System Specifications

### 4.1 Data Flow

The flow of Service Data through a typical PS Financials system is illustrated below



### 4.2 Accounting

- PS Financials Accounting module is a desktop Application based user interface
- The software is written in DotNet and C# (C Sharp) and runs exclusively on Microsoft SQL Server databases
- The application's database holds accounting structural and transactional data involved in the processing of an organisations Financial Accounts and in the production of Financial Management and Statutory reports of Balance Sheet and Profit and loss.

The Unified ledger design of PS Financials means that a single ledger account could actually be defined for a variety of different purposes, some of which may hold personal data.

For instance, a ledger account could be :

- A supplier,
- A Customer,
- Staff Member,
- Project, Cost Centre, Resident, Vehicle, Product etc

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Each ledger account has a fixed set of fields against it, and below are the key fields which may be holding personal data.

Accounting	Purchase Ordering	Sales Ordering	PS Expenses	Timesheet
Account Code	Delivery location	Delivery location	Code	Code
Account Name	contact name	contact name	Name	Name
Pre Name	contact phone number	contact phone number	Email	Email
Alternative Title	contact email	contact email		
Address Lines 1-3				
Post Town				
County				
Post Code				
Country				
Telephone Number				
Fax Number				
Contact Name				
Turnover Limit				
Email Address				
Payment Terms				
Bank Account Number				
Sort code Number				
Payee				

User fields	User fields	User fields		
Indexes	Indexes	Indexes		

In addition:

a ledger account can hold an unlimited number of 'userfields' which could be holding personal data.

a ledger account can hold an unlimited number of 'Indexes' which could be holding personal data.

A Microsoft Reporting Services report can be requested from PS Financials Ltd which can be used to list all userfields and indexes for a specified ledger account.

The underlying data extract for the report could also be used to provide data to report writing software of your own choosing.

### 4.3 Purchasing and Sales Data

PS Financials holds and processes data allowing customers to raise a Purchase Order, receipt goods and raise a Purchase Invoice. This data is held solely in the main PS Financials database

PS Financials holds and processes data allowing customers to raise a Sales Order directly as a Sales Invoice. This data is held solely in the main PS Financials database

For both Purchasing and Sales the documents are raised primarily through Web Browser screens

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The personal data associated with the Purchase and Sales modules is documented in the table above.

## **4.4 Expenses and Timesheet Data**

The PS Expenses and Timesheets module allows its users to input requests to claim Expenses from their employer, and to record work done in timesheet forms. Both types of information are input through Web Browser screens.

Data for both the expense claim and timesheets is held and processed in a separate database to the main Accounting database. The data is transferred to the Accounting database for payment and charging purposes.

The personal data held in the expenses database is identified in the last 2 columns of the fixed data fields table.

## **4.5 Payment Data**

Any service data generated from PS Financials for the purposes of electronic payment to a bank is solely the responsibility of the customer to perform the transmission. PS Financials do not transmit bank data on behalf of a customer.

## **4.6 Additional Modules**

For the sake of transparency and completeness, there are a number of ancillary modules which perform specific functionality but use the core PS Financials database for data and hold no other personal data of their own. These include

- PS Accruals
- PS Credit Control
- Income Management (Recurring Billing)
- Direct Debit Manager and Dispute Handler
- Data Transformation Tool
- Document Management
- Emailing Suite
- HMRC Gateway
- Advanced workflow
- Myinterfaces
- Sentinel
- PS Data Archive Utility
- Smartview
- MyPortal
- PS Purchasing
- PS Expenses
- Report Director



## 5. Data Protection and Security

- PS Financials Ltd complies with the Data Protection Act 1998 and any equivalent binding UK legislation (new Data Protection Bill) and incorporating the General Data Protection Regulation('GDPR') which comes into force on 25th May 2018.
- PS Financials Ltd will not divulge any of the Customer's confidential information to any person except to its own officers, employees, agents and representatives and then only to who need access to that information to enable PS Financials to fulfil its contractual obligations to the Customer.
- We confirm that if PS Financials Ltd processes any Service Data on the Customer's behalf when performing its obligations, then the Customer shall be the data controller and PSF shall be a data processor, and that:
  1. The Customer shall ensure that it is entitled to transfer the relevant Service Data to PS Financials Ltd;
  2. We will only act on the written instructions of our Customer (unless required by law to act without such instructions);
  3. We will ensure that people processing the Service Data are subject to a duty of confidence;
  4. We take appropriate measures to ensure the security of processing;
  5. We will only engage a sub-processor with the prior agreement of our Customer which is given in the contractual agreement between PS Financials and our Customer;
  6. We shall inform the Customer of any intended changes concerning the addition or replacement of sub contracted processors;
  7. We will assist our Customer in providing subject access and allowing data subjects to exercise their rights under the GDPR;
  8. We will assist our Customer in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessment;
  9. We will delete or return all Service Data to our Customer as requested or as stipulated at the end of the contract;
  10. We will submit to audits and inspections and provide the controller with whatever information it needs to ensure that we are both meeting the Article 28 obligations and tell the controller immediately if we are asked to do something infringing the GDPR or other data protection law of the EU or a member state;
  11. We acknowledge that nothing within our contract relieves us of our own direct responsibilities and liabilities under the GDPR;
  12. We will co-operate with supervisory authorities (such as the ICO) in accordance with Article 31 of the GDPR;
  13. We will ensure the security of our processing in accordance with Article 32;
  14. We will keep records of our processing activities in accordance with Article 30.2;
  15. We will notify any data breaches to the controller in accordance with Article 33;
  16. We employ a data protection officer in accordance with Article 37

# PS Financials - Data Protection & GDPR

- The PS Financials system incorporates a rigorous security protocol allowing access to authorised personnel only, via a User Name and Password.
- Authorised users are also subject to access restrictions determined by their personal level of security clearance.
- Each Customer administrator can set up their own **Access Levels** using a straightforward tick box system, to add or remove access to parts of the system at different security levels.

## 6. Data Holding and Destruction Policy

- PS Financials Ltd recognises that privacy and data security issues are top priorities for Customers. PS Financials Ltd does not disclose Service Data except as necessary to provide its services to its Customers and comply with the law.
- PS Financials Ltd stores its service data for PS Cloud at data centres based in the UK.
- PS Financials Ltd is committed to the protection of data held whilst customers are accessing the system
- If a customer cancels their agreement for PS Cloud then they have 30 days to request copies of all their data, after which time their Customer setup for software and databases, including all backups, is deleted from the PS Cloud system, meaning that all personal data is removed.
- If a customer is running PS Financials as a local 'on premise' installation and cancels their agreement with PS Financials Ltd, the Customer is asked to remove all related software from their systems.
- No paper copies of customer data are held at any time by PS Financials. Access is solely via our secure systems for the purposes of guaranteeing Project Partners' full and comprehensive use of the system and to realise our aim of effective, first class customer service.
- In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose personal data to respond to court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information with relevant law enforcement agencies or public authorities if we believe same to be necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms and Conditions, or as otherwise required by law.

## 7. Software Renewal Policy

- PS Financials Ltd utilizes different software applications in our rolled-out products. When new versions of software are released, for security and stability reasons, we carry out research to determine if any of the changes effect components/functions that we use.
- If we highlight any changes that are security based and could comprise our software build, we aim to have the software updated as soon as possible.
- If we highlight any changes that are feature based, that do not affect the day to day running of the system, we look to roll these updates out at the next development cycle for updates.

## 8. Security Auditing

Data Protection is of paramount importance to PS Financials Ltd operations and therefore we conduct regular Security Audits and penetration (pen) testing of all our systems and processes.

PS Cloud has been tested and approved by the National Computer Centre (NCC)

## 9. Useful Information

### **PS Financials**

Park House,  
Peterborough Business Park,  
Lynch Wood,  
Peterborough  
PE2 6FZ

PS Financials Ltd Data Protection Registration Number – Z6413626

Company Registration Number – 04323067

**If you have a more in-depth query that relates to Data Protection please e-mail our Data Protection Officer at:**

[DataProtectionOfficer@PSFinancials.com](mailto:DataProtectionOfficer@PSFinancials.com) or [DPO@PSFinancials.com](mailto:DPO@PSFinancials.com)