

Record of Processing

In order to comply with Article 30 of the GDPR, IRESS has produced this Record of Processing document. The below table includes the required information in relation to SmartHub.

Processor name & contact details	IRESS FS Limited (company number 02958430) Registered address: 1 Kingmaker Court, Warwick Technology Park, Gallows Hill, Warwick CV34 6DY
Processor's Data Protection Officer	IRESS has not appointed a Data Protection Officer in the UK and is not required to do so pursuant to Article 37 of the GDPR. The role and responsibilities that would typically be assumed by a Data Protection Officer are spread across our legal, information security, compliance and risk functions within IRESS. Queries in relation to IRESS' processing operations should be directed to IRESS' Compliance Officer who can be contacted at compliance@iress.com . Any actual or suspected privacy breaches should be reported to our information security team who will manage the incident in accordance with its incident management procedure.
Controller name & contact details	<CUSTOMER NAME> <CUSTOMER CONTACT DETAILS>
Categories of processing	Provision of software products/services/solutions and related services such as support services, training, invoicing, administration and maintenance of client relationships Marketing
Transfers of personal data outside of the EU	IRESS may transfer Customer Personal Data outside of the EEA to companies within the IRESS group, or to certain third parties authorised by the Controller either specifically or via a general authorisation. In order to obtain general authorisation, we maintain a list of sub-processors (by product) on our website (these are accessible via the Trust Centre/ Data Protection pages). If you would like us to notify you when we make changes to this list please email dpa@iress.com with the subject "Subscribe".
Countries where personal data is transferred to outside of the EU	IRESS Group companies outside of the EU are based in Australia, Singapore, Canada and South Africa. The Authorised Processors list, including details of the territory in which they are based, can be viewed through the Trust Centre, Data Protection section of the IRESS website.
The safeguards in place for exceptional transfers of personal data to countries outside of the EU	To be identified if and when applicable.

Technical and organisational security measures	Please refer to the Information and Security Summary and Controls document available the Trust Centre, Data Protection section of the IRESS website.
Data Retention	Unless there is a specific data retention period built into the product/ service, the Customer, as Controller, will be responsible for determining data retention periods applicable to the data it stores within the product/ service. Where the product/ service is hosted by IRESS and the customer deletes data, this data will be retained in back-up for a period of up to 6 months, following which it will be deleted. (We are working towards reducing this period to 35 days, and will update this record of processing when this takes effect).