



## axe10app Cloud Data Protection Policy

### Introduction

This policy details the legally compliant use of “axe10app”, a software application, that is developed, owned and distributed by Axeten Ltd.

axe10app allows for effective gathering of material with eDisclosure reporting, and eForensic logging and hashing of all material files.

axe10app Cloud is a secure platform, that provides remote desktop functionalities, including database storage.

This policy addresses the matter of privacy and the protection of personal data where axe10app is delivered as a cloud application.

### Relevant Legislation & Directives

- EU Regulation 2016/679 (General Data Protection Regulation) of the European Parliament and of the Council, issued on 27 April 2016, and;
- Data Protection Act 2018 and any sub-legislation contained therein, where;
- part 3 of the Act transposes the EU Data Protection Directive 2016/680 (Law Enforcement Directive) into domestic UK law.

### Scope of axe10app Cloud Compliance

The scope of this policy covers the management of personal data relating to the:-

1. creation of a private and secure environment, and;
2. deployment of the service and customer employees, and;
3. use of the service, where personal data relating to any other person, might be gathered from publicly available and restricted sources, and;
4. cloud storage and transfer away from the cloud.



## Privacy on the Cloud

The cloud service is supplied by Amazon Web Services. Refer to the AWS privacy statement.

<https://aws.amazon.com/compliance/>

<https://aws.amazon.com/compliance/data-privacy-faq/>

Before any personal data is stored on the AWS cloud, Axeten shall establish a Trust Relationship with the Customer. The Trust Relationship sets out the procedures and protocols to secure personal information, so that it shall remain private.

## Cloud Deployment Options and Privacy Choices

The Customer may:

1. acquire a cloud solution directly from AWS, so that they might exclude Axeten from the cloud service and where no Trust Relationship is required, or;
2. acquire an AWS cloud service from Axeten, so that a Trust Relationship might be required where intervention from Axeten is requested by the customer, or;
3. acquire a managed AWS cloud service from Axeten, so that the privacy of personal data is managed under the Trust Relationship.

## axe10app & Privacy

Where supplied as a cloud application, axe10app contains no personal data.

Axeten seeks to anonymise customer users. Axeten has no requirement to store the personal data of a Customer user, other than a Customer Admin contact, who might be identified by first name and last name. A Customer Admin e-mail address or phone number supplied to Axeten, might not be personal.

Please see the axe10app Security Policy and Protocol for additional information on the secure practices for the capture of personal data.

All investigators and practitioners might be identified by a number, that is supplied by the Customer Admin. Axeten has no requirement to know the name, or any other personal details, about investigators or practitioners.



Login credentials shall be established and stored in compliance with the Trust Relationship.

Login credentials are necessary for the authentication process, so that the Customer user is validated as a legitimate user with rights to deploy axe10app.

The login credentials are stored in encrypted format on a Axeten AWS server, and are communicated to the server using the TLS 1.2 cryptographic protocol.

axe10app, does not 'store' personal data, though the application does hold personal data during the processing activity.

At intervals during the processing activity, or at the end of the processing activity, personal data might be stored on the cloud.

### Customer Compliance

Where the Customer deploys axe10app for research purposes, the nature of the activity is to collect personal information on any Third Party that might be a subject of research.

All Third Party personal data gathered by the Customer is saved to the AWS cloud. All personal data might be transferred to a local or networked hard drive of the Customer. No data or personal information acquired by the Customer is transferred to any other server managed or owned by Axeten, except where a managed backup service is purchased.

While using axe10app Cloud to conduct research and report the outcomes, it is the responsibility of the customer to comply with established safe practices and protocols.

### Notification of Changes to this Policy

Every six months, Axeten may make changes to this policy to reflect any changes in legislation, best practice and technology enhancements. axe10app Cloud users are notified of any changes by way of the axe10app Changelog.

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