

TopSource Global Solution Ltd.



A TopSource Group Company

Data protection policy in accordance with the EU General Data Protection Regulation (GDPR)

## Data protection policy

### Goal of the data protection policy

The goal of the data protection policy is to depict the legal data protection aspects in one summarising document. It can also be used as the basis for statutory data protection inspections, e.g. by the customer within the scope of [commissioned processing](#). This is not only to ensure compliance with the European General Data Protection Regulation (GDPR) but also to provide proof of compliance.

### Preamble

TopSource Global Solutions Ltd. (Registered in England & Wales 4626779) is the limited company that owns and operates four primary brands: TopSource, Payroll Bureau, Practical Payroll Solutions and Portico. TopSource primarily processes payroll for and on behalf of client companies throughout the UK. As a core part of what we do, TopSource receives and holds the personal information of the employees of client companies. This data is needed to provide a compliant payroll service. At no time is this data used for any other purposes other than that which is specified in our contract of services.

### Security policy and responsibilities in the company

- As we hold personal information for and on behalf of companies and their employees, we consider it imperative that we hold data in a secure way at all times.
- We are determined to hold data in a secure manner. This means that we will use the latest technology, where possible, to secure data; and ensure that our processes do not unnecessarily expose data to risks of exposure to any unauthorised third party.
- We will appoint internal and external individuals who will be accountable for data security.
- We will update our policies, processes and technology regularly to achieve the safest possible data security.
- We will train our colleagues to understand the risks of handling and processing data.

### Legal framework in the company

- We have a lawful reason to hold and process data
- We will ensure that our policies meet the most recent legislative requirements
- We will follow the laws in the countries in which we work

### Documentation

- We have documentation to support our processes, technology and structures to protect data.
- This documentation is considered highly confidential. However, summary information is available is required.

### Existing technical and organisational measures (TOM)

Whilst we have BSI 2599, SSAE 16, and other certifications in place, we also require regular network and application penetration testing to ensure the security of our systems and our client's data. Our Privacy Policy provides further documentation on the use of data that we hold.

In addition to the above:

- We limit our employees' access to any data only to those clients on which they work
- We require password protection on all computers and applications
- We educate all of our colleagues on the proper use and handling of data
- We provide limited options for printing and downloading data

- We store all applications and data on hosted virtual servers that require VPN (point-to-point) access
- All applications and data are backed-up every 24 hours on secondary virtual servers
- We run regular application protection protocols to protect against malware
- We have a specialist third-party provider that monitors our applications, servers and hosting facility to ensure that we are secure and compliant.

We are open and transparent our clients about our efforts to protect data. We also remind our clients that they should always transfer data to us in a secure manner. We offer our clients the following options for secure data handling. Portico HR is our GDPR compliant HR application that offers wide-ranging functionality to meet the needs of clients of all sizes.

- Clients can password protect documents before sending them to us
- Clients can utilise Portico HR for all uploading of files onto our secure servers.
- Clients can utilise Portico HR for encrypting files before emailing them to us
- Clients can utilise Portico HR to view, validate and store output reports that we produce
- Clients can utilise Portico HR to receive payslips for their employees
- Clients can utilise Portico HR for employees to individually login and view their payslips (online or on mobile)

If our clients choose alternative formats for any of the above, we will remind them that they are not following best practice in safe handling of employee data.

At all times, we encourage our clients to be mindful of taking due care when sharing or requesting any sensitive employee information.