

1 Data Privacy – A Shared Responsibility between SmartSimple and the Client

1.1 SmartSimple’s Responsibility of Client Data

SmartSimple does not own Client Data, information or material that the Client submits, stores or processes within the system. The Client authorizes SmartSimple staff to access the Client’s system, including its Data, only to respond to service or technical problems.

SmartSimple does not monitor, retain beyond the terms of their service agreement, manipulate, use or disclose any Data or any information regarding the Client or the Client’s account, or the Client’s users, without the Client’s prior written permission.

1.2 The Client’s Responsibility of Data

During the lifespan of the Client’s engagement with SmartSimple, the Client is responsible for the integrity of their data. The Client may elect to cleanse, delete or remove data, where SmartSimple can provide guidance in the proper steps to perform the task. SmartSimple will not delete or remove data at the Client’s request.

Accidental deletion can be retrieved via deletion restore. For more details:

http://wiki.smartsimple.com/wiki/Restoring_Deleted_Records

Data can also be purged from the system permanently. Note that purged data can be restored from the backup at the cost of the Client.

The Client is responsible for providing notice to users related to data collection, processing, data sharing, openness & data access, international transfer, responsibility and accountability.

1.3 Data Collection

The SmartSimple Software platform is used by clients to directly collect information from their staff and communities (communities as defined by the Client).

1.3.1 Client Responsibility

Responsibility of the collection of data both in terms of form and content (from their staff and communities) is the Client’s.

1.3.2 SmartSimple’s Role in Data Collection

SmartSimple collects two types of data:

- Data required to support the Client’s use of the system through the SmartSimple support desk as expressly requested by the Client.
- Aggregated, anonymized, non-demographic usage required to optimize service availability.

1.4 Notice & Processing

Processes related to the Client’s Data are defined and managed by the Client, not SmartSimple.

SmartSimple does not process data. It acts solely as a collection system for the Client.

1.5 Choice

Choices such as opt-in and opt-outs that are provided to users of the system are defined and managed by the Client.

1.6 Data Sharing

SmartSimple never shares data with any other organization or person.

1.7 Openness & Data Access

The Client has full control of matters related to the configuration of their system to implement their corporate openness and data access policies.

SmartSimple is neutral to client policies.

1.8 International Transfer

The Client has the flexibility to activate their system in the jurisdiction of their choice (ie. EU, US or Canada). Where international transfer of data is envisaged by the client, SmartSimple recommends that the Client seek legal advice as to the appropriate hosting location and approach.

1.9 Responsibility

Internal SmartSimple responsibilities related to the system and service delivery are defined in the Operational Procedures Guide.

The Client is responsible for defining their own internal responsibilities.

1.10 Accountability

Internal SmartSimple accountability related to system and service delivery are defined in the Operation Procedures Guide.

The Client is responsible for defining their own internal accountability.