

Re: Personal Data within Whitespace Work Software Solutions

Dear Whitespace Customer

Since the implementation of GDPR on 25th May 2018 Whitespace Work Software has received numerous questions on the implication of storing personal data within Whitespace solutions and what rights are necessary to comply with EU General Data Protection Regulation 2016/679 (GDPR), specifically around the right of erasure (right to be forgotten).

Whitespace solutions do not require personal data to achieve their specified functionality, however, should customers wish to store personal data within the Whitespace solutions to drive communications or other activities then they should be aware of the following responsibilities under GDPR:

- As the Controller, a customer is responsible for accuracy and maintenance of personal data in the Whitespace solutions.
- As the Controller, a customer is responsible for gaining consent from an individual to use their personal data for the intended purpose, i.e. emailing waste collection updates.
- As the Processor, Whitespace Work Software follows instructions from the Controller regarding the processing of personal data and do not process personal data for any purpose other than that specified by the Controller.
- Whitespace solutions keep an audit trail of completed activities, these audit records may contain personal information. Controllers accept that there is no right of erasure for these records

Whitespace is committed to information security and compliance with appropriate regulations, as such it will continue to monitor the situation closely and review its position as and when further GDPR clarifications are available.

If you have any questions, please contact your Whitespace Account Manager directly.

Yours faithfully



Mark Garvey
Chief Executive Officer