SmarterPay

Backup and Data Retention

Contents

Document Management

Version	Name	Revision Date	Change
0.1	Chris Bell	13/02/2023	Document created
1.0	Chris Bell	22/04/2024	Updated Data Retention

Purpose

The purpose of this document is to determine the Backup and Data retention Policy within Smarterpay Systems

Scope

This process applies to all data and personnel in Smarterpay.

Responsibility and Authority

The Smarterpay Executive holds overall authority for this policy.

Responsibility	Appointment
Periodic review and maintenance	Information Processing Manager
Release approval	CTO

Introduction

This document covers Clause 12.3.1 of SMARTERPAY's ISO27001 certification.
As part of SMARTERPAY's ISMS, to ensure the integrity and availability of data, SMARTERPAY are required to take regular backups that allow:
Primary software functionality to be restored and data critical to operations to be recovered in the event of a disaster scenario, in accordance with respective SLAs for each service provided.
The protection of integrity of customers data, allowing the recovery of data that may have been lost, damaged or modified by accident.

This policy also contains details on the retention of data within SMARTERPAY's environments as this goes hand in hand with backups.

Backups
Scope of systems
2.1.1   Backups will be taken from all systems critical to the delivery of the following services:
- Smarterpay Cloud
- Salesforce DDMS
- iConnect
- Bureau Online Services
- Validata
- SMARTERPAY's Website & CDN

2.1.2   Backups will also be taken from supporting systems including those under SMARTERPAY's Office 365 subscription (Including emails).

2.1.3 | Items not included in the scope and therefore are not backed up are:

- Information held in a non-electronic format

- Data stored on individual's staff's PCs and end user's devices

Backup procedures

2.2.1 | SMARTERPAY will use and maintain a backup solution suitable for its purposes.

2.2.2 | Backups will target all servers, workstations and virtual machines in the scope and will capture all files and directories required to restore services to full functionality following a disaster scenario.

2.2.3 | Backups will be carried out daily outside of the operational hours of the specified service or at a time of expected low usage that will cause minimal disruption to services.

2.2.4 | Backups will be stored off site, in a trusted and secure cloud environment.

2.2.5 | Backup data will be stored using a separate encryption key to operational data.

2.2.6 | Where scoped machines are part of the local network and do not require internet access to deliver related services, a local backup solution will be configured and maintained to provide an extra layer of backups where normal backups over the internet could fail due to a loss of network connectivity.

2.2.7 | On the last Friday of every calendar month, backups from each service shall be manually checked and one services at random tested to make sure they are functioning correctly, and recovery will be possible if required.

Retention

3.1.1 | In accordance with SMARTERPAY's GDPR and data protection obligations, all customer data including that which is stored in backups, shall be kept for no longer than required for the purposes that they were collected.

3.1.2 | The retention periods and backup retention shall be set to provide, in managements opinion, the best balance of availability of SMARTERPAY's services and security of customer data. As such the following table details all information assets relevant to SMARTERPAY's services and their respective retention and backup periods.

Smarterpay Cloud

Onboarding

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Quote	Name	365	EOC	35 days
Contracts	Names, Email Addresses	365	EOC	35 days
Preconfiguration Sheet	Names, Email Addresses, Account Numbers, Sort Codes	365	EOC	35 days
Sample File(s)	Account Names, Account Numbers, Sort Codes	365	EOC	35 days

Processing

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Uploaded File(s)	Account Names, Account Numbers, Sort Codes	VM	1 year	35 days
File Uploader File(s)	Account Names, Account Numbers, Sort Codes	VM	1 year	35 days
Bacs Records -	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Bacs Records	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Presubmission Listing	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
File Listing	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Error/Integrity Report	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Transmit File	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Logs	User Names, Email Addresses, Account Names, Account Numbers, Sort Codes	Database	1 year	35 days

Smarterpay Cloud Objects

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Account Validation	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Bank Account	Account Names, Account Numbers, Sort Codes	Database	1 year - *NLU	35 days
Card	Account Names, Values	Database	1 year - *NLU	35 days
Client Bank Account	Account Names, Account Numbers, Sort Codes	Database	1 year - *NLU	35 days

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Credit	Account Names, Account Numbers, Sort Codes	Database	1 year - *NLU	35 days
Customer Account	Account Names, Account Numbers, Sort Codes	Database	1 year - *NLU	35 days
Mandate	Account Names, Account Numbers, Sort Codes	Database	1 year - *NLU	35 days
Modulus Check	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Payment	Account Names, Account Numbers, Sort Codes	Database	1 year - *NLU	35 days
Payment-Represent	Account Names, Account Numbers, Sort Codes	Database	1 year - *NLU	35 days
Recurrence Schedule	Account Names, Account Numbers, Sort Codes	Database	1 year - *NLU	35 days
Service User Number	Account Names, Account Numbers, Sort Codes	Database	1 year - *NLU	35 days
File Submission	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
File Submission Line	Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Outbound Message	Names, Email Addresses, Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Logs	User Names, Email Addresses, Account Names, Account Numbers, Sort Codes	Database	1 year	35 days
Object History	History of Each Item	Database	1 Year	35 days

Bureau (submission for SMPC)				
Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Contingency Form	Names, Email Addresses, Account Numbers, Sort Codes, Signatures	LAN	EOC	3 months
Uploaded File(s)	Account Names, Account Numbers, Sort Codes	VM	30 days	35 days
Bacs Records	Account Names, Account Numbers, Sort Codes	Database	30 days	35 days
Presubmission Listing	Account Names, Account Numbers, Sort Codes	VM	1 year	3 months
Transmit File	Account Names, Account Numbers, Sort Codes	VM	1 year	3 months
Logs	User Names, Account Names, Account Numbers, Sort Codes	VM	1 year	3 months

iConnect				
Onboarding				
Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Quote	Name	LAN	EOC	3 months
Contracts	Names, Email Addresses	LAN	EOC	3 months

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Preconfiguration Sheet	Names, Email Addresses, Account Numbers, Sort Codes	LAN	EOC	3 months
iConnect Database	Names, Email Addresses	Database	EOC	35 days
Originator Bank Account Details	Account Names, Account Numbers, Sort Codes	Database	EOC	35 days
Sample File(s)	Account Names, Account Numbers, Sort Codes	LAN	1 year	3 months

Processing

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Uploaded File(s)	Account Names, Account Numbers, Sort Codes	VM	30 days	35 days
File Uploader File(s)	Account Names, Account Numbers, Sort Codes	VM	30 days	35 days
Bacs Records	Account Names, Account Numbers, Sort Codes	Database	30 days	35 days
Presubmission Listing	Account Names, Account Numbers, Sort Codes	VM	1 year	35 days
File Listing	Account Names, Account Numbers, Sort Codes	VM	1 year	35 days
Error/Integrity Report	Account Names, Account Numbers, Sort Codes	VM	1 year	35 days
Transmit File	Account Names, Account Numbers, Sort Codes	VM	1 year	35 days
Logs	User Names, Email Addresses, Account Names, Account Numbers, Sort Codes	VM	1 year	35 days

Contingency

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Contingency Form	Names, Email Addresses, Account Numbers, Sort Codes, Signatures	LAN	EOC	3 months
Uploaded File(s)	Account Names, Account Numbers, Sort Codes	VM	30 days	35 days
Bacs Records	Account Names, Account Numbers, Sort Codes	Database	30 days	35 days
Presubmission Listing	Account Names, Account Numbers, Sort Codes	VM	1 year	3 months
Transmit File	Account Names, Account Numbers, Sort Codes	VM	1 year	3 months
Logs	User Names, Account Names, Account Numbers, Sort Codes	VM	1 year	3 months

Reports

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Reports	Account Names, Account Numbers, Sort Codes	VM	1 year	3 months

Bureau Online Services

Onboarding

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Contacts	Name, Email Address, Account Number, Sort Code	LAN	EOC	3 months
BOS Database	Name, Email Address	Database	EOC	35 days

Processing

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Fax Paper Record	Name	Office	~30 days	74 days
Uploaded File(s)	Account Names, Account Numbers, Sort Codes	VM, LAN	30 days	35 days
Bacs Records	Account Names, Account Numbers, Sort Codes	Database	30 days	35 days
Presubmission Listing	Account Names, Account Numbers, Sort Codes	VM, LAN	1 year	35 days
File Listing	Account Names, Account Numbers, Sort Codes	VM	1 year	35 days
Transmit File	Account Names, Account Numbers, Sort Codes	VM	1 year	35 days
Logs	Account Names, Account Numbers, Sort Codes	VM	1 year	35 days

Reports

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Reports	Account Names, Account Numbers, Sort Codes	VM	1 year	3 months

Validata

Onboarding

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Validata Database	Email Address	Database	EOC	35 days

Processing

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention
Logs	IP Address, Email Address	VM	~2 months[1]	35 days

Common

Origin	Personal/Confidential Data	Location	Normal Retention	Backup Retention

Emails	IP Address, Email Address, Any confidential content disclosed by Customer	Cloud	1 Year	-
Infrastructure logs	IP Address	Cloud	31 Days	-
Customer Database	Name, Email Address	Database	EOC	35 days
Customer Usage Data	Usage, Sort Codes,Account Numbers, Account Names	Salesforce	EOC	1 Year

*NLU	No Longer Used - A Payment, Schedule, Bank Account, Mandate attached to a disabled Mandate and or Bank Account, the timer starts after the master record is disabled
	Mandates and related Bank Account records are disabled automatically after 2 years IF the have no payment records created against them

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