

mSIS Cloud Data Protection Policy

Introduction

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

mSIS is an acronym of Multi-Source Investigation Suite.

mSIS allows for effective gathering of internet intelligence for investigations, with expedited reporting, and a secure Audit Log, with file hashing of the evidence.

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

Relevant Legislation & Directives

- Data Protection Act 2018 and any sub-legislation contained therein, and;
- Directive 2016/680 of the European Parliament and of the Council of 27 April 2016

Scope of mSIS 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. Please refer to the AWS privacy statement. <https://aws.amazon.com/compliance/data-privacy-faq/>

Before any personal data is stored on the AWS cloud, Qwarie 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 Qwarie from the cloud service and where no Trust Relationship is required, or;
2. acquire an AWS cloud service from Qwarie, so that a Trust Relationship might be required where intervention from Qwarie is requested by the customer, or;
3. acquire a managed AWS cloud service from Qwarie, so that the privacy of personal data is managed under the Trust Relationship.

mSIS & Privacy

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

Qwarie seeks to anonymise customer users. Qwarie 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 Qwarie, might not be personal. Please refer to mSIS 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. Qwarie 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 mSIS.

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

mSIS, 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 mSIS 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 Qwarie, except where a managed backup service is purchased.

While using mSIS 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

From time to time, Qwarie may make changes to this policy to reflect any changes in legislation, best practice and technology enhancements. mSIS Cloud users are notified of any changes by way of the mSIS Changelog.

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