

Plandek use of personal data and GDPR compliance – summary

Plandek platform and data usage

- Plandek is a cloud-based analytics platform (European Google cloud) that is used by clients to analyse their end-to-end software delivery process
- Plandek works by mining data held in clients' underlying software delivery toolsets (e.g. Jira, Git, Jenkins) to surface delivery metrics in customisable dashboards used by the client to optimise their (internal) delivery process
- As such, Plandek only holds data already present in these underlying toolsets. This includes company employee email addresses, code written and certain actions taken by the employees (e.g. completing a Pull Request)
- The employee data is not shared with any third-party and is only used by the client teams themselves to improve their own performance over time
- Plandek allows analytical drill-down by workstream, team and individual (e.g. an individual's Completed Tickets). However, if desired, the individual view can be disabled, so data is only visible at a team level

Plandek data protection compliance

- **Plandek complies with applicable data protection legislation, including the General Data Protection Regulation**
- **To the extent that Plandek processes personal data, Plandek is a Data Processor on behalf of the client, which remains the Data Controller**
- Any personal data held within Plandek's platform is **used for the client's own internal purposes only** (and Plandek as Data Processor does not have the right to use the client data for its own purposes)
- Plandek's terms and conditions include a data protection addendum, containing the terms required by the GDPR between Data Controllers and Data Processors

- When Plandek is used by the client:
 - the client can choose to have their Privacy Notice displayed to all users. It is the client's responsibility as the Data Controller to inform its employees about how their personal data is being processed, whether or not this is done through the platform
 - all personal data is encrypted, securely held and not accessible to Plandek as Data Processor without client permission. Where such permission is granted, Plandek only processes such personal data in accordance with the client's instructions
 - only existing data held within company toolsets is collated and surfaced within the Plandek dashboards (no new personal data is collected)
 - the data is not shared outside the client company and is only used by the client employees themselves to self-improve their own performance in the workplace.

