

**GDPR**

**Policy**

**May 2018**

**Context and Overview**

**Key Details**

* **Policy prepared by: Belinda Sanderson, Data Controller**
* **Approved by Director: Iain Sanderson, Director**
* **Policy became operational on: 1st May 2018**
* **Next review date: 1st May 2019**

**Introduction**

Capvond Plastics Ltd needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company’s data protection standards.

**Why this policy exists**

This data protection policy ensures Capvond Plastics Ltd:

* Complies with data protection law and follow good practice
* Protects the rights of staff, customers and partners
* Is open about how it stores and processes individuals’ data
* Protects itself from the risk of a data breach

**Data Protection law**

The Data Protection Act 1988 describes how organisations – including Capvond Plastics – must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and disclosed unlawfully.

The Data Protection Act is underpinned by 8 important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of the data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the EEA, unless that country or territory also ensures an adequate level of protection.

**People, risks and responsibilities**

**Policy scope**

This policy applies to:

* The Registered Office of Capvond Plastics Ltd
* All staff of Capvond Plastics Ltd
* All contractors, suppliers and other people working on behalf of Capvond Plastics Ltd

It applies to all the data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1988. This can include:

* Names of individuals
* Postal addresses
* Email addresses
* Telephone Numbers
* ….plus any other information relating to individuals

**Data protection risks**

This policy helps to protect Capvond Plastics Ltd from some very real date security risks, including:

* Breaches of confidentiality. For instance, information being given out inappropriately.
* Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
* Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

**Responsibilities**

Everyone who works for or with Capvond Plastics Ltd has some responsibility for ensuring date is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled in line with this policy and data protection principles.

However, these people have key areas of responsibility:

* The directors are ultimately responsible for ensuring that Capvond Plastics Ltd meets its legal obligations
* The data protection officer, Belinda Sanderson, is responsible for:
  + - * 1. Keeping the Directors updated about data protection responsibilities, risks and issues.
        2. Reviewing all data protection procedures and related policies, in line with an agreed schedule.
        3. Arranging data protection training and advice for the people covered by this policy.
        4. Handling data protection questions from the staff and anyone else covered by this policy.
        5. Dealing with requests from individuals to see the data Capvond Plastics Ltd holds about them (also called ‘subject access requests’).
        6. Checking and approving any contacts or agreements with third parties that may handle the company’s sensitive data.
  + The person responsible for IT and marketing, Belinda Sanderson, is responsible for:
    - * 1. Ensuring all system, services and equipment used for storing data meet acceptable security standards.
        2. Performing regular checks and scans to ensure security hardware and software is functioning properly.
        3. Evaluating any third-party services, the company is considering using to store or process data. For instance, cloud computing services.
        4. Approving any data protection statements attached to communications such as emails and letters.
        5. Addressing any data protection queries from external outlets
        6. Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

**General staff guidelines**

* The only people able to access data covered by this policy should be those who need it for their work.
* Data should not be shared informally. When access to confidential information is required, employees can request if from the office.
* Capvond Plastics will provide training to all employees to help them understand their responsibilities when handling any data.
* Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
* In particular, strong passwords must be used and they should never be shared.
* Personal data should not be disclosed to unauthorised people, either within the company or externally.
* Data should be regularly reviewed and updated if it is to be found to be out of date. If no longer required, it should be deleted and disposed of.
* Employees should request help from the office/data protection officer if they are unsure about any aspect of data protection.

**Data storage**

These rules describe how and where the data should be safely stored. Questions about storing data safely can be directed to the office/data protection officer.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

* When not required, the paper or files should be kept in a locked drawer or filing cabinet.
* Employees should make sure papers and drawings are not left where unauthorised people could see them, like on a printer or wall.
* Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious attempts:

* Data should be protected by strong passwords that are changed regularly and never shared between employees.
* If data is stored on removable media (like CD or DVD), these should be kept locked away securely when not being used.
* Data should only be stored on designated drives ands servers, and should only be uploaded to an approved cloud computing services.
* Data should be backed up frequently. Those backups should be tested regularly, in line with the company’s standard backup procedures
* Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
* All computers containing data should be protected by approved security software and firewall.

**Data use**

Personal data is of no value to Capvond Plastics Ltd unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

* When working with personal data, employees should ensure the screens of their computers are locked when left unattended.
* Personal data should not be shared informally. In particular, it should never be sent by e-mail, as this form of communication is not secure.
* Personal data must be encrypted before being transferred electronically.
* Personal data should never be transferred outside of EU.
* Employees should not save copies of personal data to their own computers, lap tops or phones.

**Data accuracy**

The law requires Capvond Plastics Ltd to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Capvond Plastics should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept accurate and up to date as possible.

* Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
* Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer’s details when they call.
* Capvond Plastics will make it easy for data subjects to update the information Capvond Plastics holds about them.
* Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

**Subject access requests**

All individuals who are subject of personal data held by Capvond Plastics are entitled to:

* Ask what information the company holds about them and why.
* Ask how to gain access to it.
* Be informed how to keep it up to date.
* Be informed how the company is meeting its data protection obligations.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at [office@capvond.co.uk](mailto:office@capvond.co.uk). The data controller can supply a standard request form, although individuals do not have to use this.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

The data controller will aim to provide the relevant data within 14 days.

**Disclosing data for other reasons**

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Capvond Plastics will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Directors, and from the company’s legal advisers where necessary.

**Providing information**

Capvond Plastics aims to ensure that individuals are aware that their data is being processed, and that they understand:

* How the data is being used
* How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

[This is available on request. A version of this statement is also available on the company’s website]