

**DP Seals Ltd.**

Unit 6, Dawkins Road
Poole, Dorset BH15 4JY

Tel: +44 (0)1202 674671

Email: info@dpseals.com

Web: dpseals.com

Data Protection Policy

Introduction

DP Seals Ltd regards the lawful and correct processing of personal and sensitive data as an integral part of its business. DP Seals Ltd believes this is vital for maintaining the confidence of its customers and employees about whom we process data.

Policy Statement

This Data Protection Policy explains how DP Seals Ltd will meet its legal obligations concerning confidentiality and data security standards. The requirements within the policy are primarily based upon the General Data Protection Regulation (GDPR), which is the key piece of legislation covering data security and confidentiality of personal and sensitive personal data in the European Union.

- DP Seals Ltd will fully implement all aspects of the GDPR.
- DP Seals Ltd will ensure all employees and others handling personal data are aware of their obligations and rights under the GDPR.
- DP Seals Ltd will implement adequate and appropriate physical and technical measures and organisational measures to ensure the security of all data contained in or handled by its systems.

The main focus of this policy is to provide guidance about the protection, sharing and disclosure of personal data, but it is important to stress that maintaining confidentiality and adhering to data protection legislation applies to anyone handling personal data or personal sensitive data on behalf of DP Seals Ltd.

Registration with the Information Commissioner

The Information Commissioners Office requires every data controller (i.e. organisation) in the UK to pay a fee to the Information Commissioner's Office (ICO) and outline the categories of data they hold about people, and what they do with it.

DP Seals Ltd is registered with the ICO to '...process personal information to enable us to pursue our business interests and promote and advertise our services; maintain our own accounts and records; and support and manage our employees. We also process personal information to enable us to provide a service to our customers and clients.'

Definitions of Personal Data and Sensitive Personal Data

- All identifiable employee data
- All other personal data processed by DP Seals Ltd.

Examples of personal identifiable data DP Seals Ltd processes include:

- Names, addresses, emails, phone numbers and other contact information
- National insurance numbers and payroll data
- Photographs and video recordings.



Certain types of data are regarded as sensitive and attract additional legal protection. Sensitive personal data is considered to be any data that could identify a person such as:

- The racial or ethnic origin of the individual
- Political opinions or affiliations
- Religious beliefs or other beliefs of a similar nature
- Membership of a trade union
- Physical or mental health or condition
- Sexual life
- Commission or alleged commission of any offence
- Any proceeding for any offence committed or alleged to have been committed or disposal of such proceedings or the sentence of court in such proceedings
- Bank account details, any official identification details such as passport or driving licence numbers etc.

Data Protection Principles

The eight Data Protection principles that lie at the heart of the GDPR give the Regulation its strength and purpose. To this end, DP Seals Ltd fully endorses and abides by the principles of data protection. Specifically, the six principles require that:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or are rectified without delay;
- kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals, and;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Personal data and sensitive personal data must not be used other than for the specific purpose required to deliver a product or service. The individual should always know that their data is being processed. When that data is especially sensitive, consent is required before the data can be processed by DP Seals Ltd.

A record can be in computerised and/or in a physical format. It may include such documentation as:

- Manually stored paper files e.g. customer Orders, employee records
- Hand written notes
- Letters to and from DP Seals Ltd
- Electronic records
- Printouts
- Photographs
- Videos recordings



Backup data (i.e. archived data or disaster recovery records) also falls under the DPA; however, a search within them should only be conducted if specifically asked for by an individual as an official Subject Access Request.

Rights of Access by Individuals

The GDPR gives every living person (or their authorised representative) the right to apply for access to the personal data which organisations hold about them irrespective of when and how they were compiled, i.e. hand written records, electronic and manual records held in a structured file. This is called a Subject Access Request. The GDPR treats personal data relating to employees, members and clients alike.

Practical Implications

Understanding and complying with the eight Data Protection Principles is the key to understanding and complying with the Inn's responsibilities as the data controller. Therefore, DP Seals Ltd will, through appropriate management, and strict application of criteria and controls:

- Ensure that there are lawful grounds for using the personal data
- Ensure that the use of the data is fair and meets one of the specified conditions
- Only use sensitive personal data where we have obtained the individual's explicit consent (unless an exemption applies)
- Only use sensitive personal data, if it is absolutely necessary
- Only obtain and use personal data for those purposes which are known to the individual
- Ensure personal data is only used for the purpose it was given. If we need to use the data for other purposes, further consent will be obtained.
- Only keep personal data that is relevant to DP Seals Ltd
- Keep personal data accurate and up to date
- Only keep personal data for as long as is necessary
- Always adhere to our Subject Access Request Procedure and be receptive to any queries, requests or complaints made by individuals in connection with their personal data
- Ensure individuals are given the opportunity to 'opt in' to receiving mass communications
- Take appropriate technical and organisational security measures to safeguard personal data.

In addition, DP Seals Ltd will ensure that:

- There is an employee appointed as the Data Protection Controller with specific responsibility for Data Protection in DP Seals Ltd. This is currently David Whetton.
- Everyone managing and handling personal data and sensitive personal data understands that they are legally responsible for following good data protection practice and has training to ensure this happens.
- Everyone managing and handling personal data and sensitive personal data is appropriately supervised by their line manager.
- Enquiries about handling personal data and sensitive personal data are dealt with promptly.
- Methods of handling personal data and sensitive personal data are clearly described in policies and guidance.
- A review and audit of data protection arrangements is undertaken annually.
- Methods of handling personal data and sensitive personal data are regularly assessed and evaluated by the Data Protection Controller and relevant members of the DP Seals Senior Management Team.



- Performance with personal data and sensitive personal data handling is regularly assessed and evaluated by the Data Protection Controller and relevant members of the DP Seals Management
- Formal written Data Processing Agreements are in place before any personal data and sensitive personal data is transferred to a third party.

Roles and Responsibilities

Maintaining confidentiality and adhering to data protection legislation applies to everyone at DP Seals Ltd. DP Seals Ltd will take necessary steps to ensure that everyone managing and processing personal data understands that they are responsible for following good data protection practice.

- Observe all guidance and codes of conduct in relation to obtaining, using and disclosing personal data and sensitive personal data
- Obtain and process personal data and sensitive personal data only for specified purposes
- Only access personal data and sensitive personal data that is specifically required to carry out their activity or work
- Record data correctly in both manual and electronic records
- Ensure any personal data and sensitive personal data is held is kept secure
- Ensure that personal data and sensitive personal data is not disclosed in any form to any unauthorised third party
- Ensure personal data and sensitive personal data is sent securely

Responsibility of the Data Protection Controller - As the appointed data protection person, the Data Protection Controller has responsibility for Data Protection within DP Seals Ltd. DP Seals Ltd has a duty to ensure that the requirements of the DPA are upheld.

The Information Commissioner's Office (ICO) – The Information Commissioner's Office is responsible for overseeing compliance e.g. investigating complaints, issuing codes of practice and guidance, maintaining a register of Data Protection Officers. Any failure to comply with DPA may lead to investigation by the ICO which could result in serious financial or other consequences for DP Seals Ltd.

Breach of Policy

In the event that an employee fails to comply with this policy, the matter may be considered as misconduct and dealt with in accordance with DP Seals Ltd's Disciplinary Policy.

Any individuals or organisations with whom DP Seals Ltd data has been shared may be personally liable for any breach of the GDPR.

Dealing with a Data Breach

If a data breach is suspected, the person who identified the breach should immediately:

1. Notify the Data Protection Controller.
2. Complete and return the Data Breach Form, which is available from the Data Protection Controller, Managing Director or Operations Manager.

Following notification of a breach, the Data Protection Controller will take the following action as a matter of urgency:

- Implement a recovery plan, which will include damage limitation.
- Assess the risks associated with the breach.
- Inform the appropriate people and companies that the breach has occurred.
- Review DP Seals Ltd's response and update our information security.



Glossary of Terms

Data Subject

An individual who is the subject of personal data or sensitive personal data. This includes employees, members, volunteers, clients, residents and tenants.

Data Controller

A person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data and sensitive personal data are, or are to be processed.

The data controller is DP Seals Ltd.

Data Processor

In relation to personal data or sensitive personal data, this refers to any person who processes that data on behalf of the data controller but it is not employed by them.

Data Processors include but are not limited to external companies who have explicit consented access to DP Seals Ltd's data.

Third Party

In relation to personal data or sensitive personal data, this refers to any person other than the data subject, the data controller, or any data processor or other person authorised to process data for data controller or processor. For example, the Police or HMRC.

Processing

Recording or holding data or carrying out any operations on that data including organising, altering or adapting it; disclosing the data or aligning, combining, blocking or erasing it.

Data Extractor

The person who takes data from a data source, such as a database, which may then be used for further activity. For example, an employee querying the database to print a list of address labels for letters.

Data Breach

A failure leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data or sensitive personal data.

Subject Access Request

A written, signed request (which includes email and other written formats) from an individual to see data which DP Seals Ltd holds about them.

Approved by: A Piper - Managing Director

Signed:

Dated: 22nd May 2018