

Data Protection Policy

INTRODUCTION

In order to provide our services Alan Browne Lapping (ABL) needs to gather and use personal data. This can include data from 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 is collected, handled and stored to meet the company's data protection standards — and to comply with the law.

To comply with the law, information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this ABL will comply with the General Data Protective Regulations in force from May 25th 2018.

In summary there are six principals in the GDPR, that personal data shall be:

1. Processed lawfully, fairly and transparently.
2. Collected for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate and where necessary up to date
5. Retained only as long as necessary.
6. Processed in an appropriate secure manner.

Policy scope

This policy applies to:

- All ABL staff
- All contractors, suppliers and other people working on behalf of ABL.

It applies to all data that the company holds relating to identifiable individuals. This can include:

- Names of individuals
- Postal addresses
- Email addresses, including business addresses that include personal names.
- Telephone numbers
- ...plus any other information relating to individuals

Responsibilities

Everyone who works for or with ABL has some responsibility for ensuring data is collected, stored and handled appropriately. However:

- The **board of directors** is ultimately responsible for ensuring that Alan Browne Lapping meets its legal obligations.
- The **data protection officer**, is responsible for:
 - Keeping the board updated about data protection responsibilities, risks and issues.

Alan Browne Lapping Services Ltd

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- Reviewing annually all data protection procedures and related policies as well as updating privacy policy audit and lawful basis for processing personal data.
- Help employees understand their responsibilities.
- Dealing with requests from individuals to see the data Alan Browne Lapping holds about them.
- Checking and approving any third parties that may handle the company's sensitive data. **Accountants, IT support, HR support, software support, trade associations etc**
- Must notify the ICO (Information Commissioner's Office) and customers of any data breaches within 72 hours.

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**.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- Once a month, as part of their tidying/cleaning routine staff will check all their working areas (which includes computers) for data protection policy compliance issues.
- In particular, **strong passwords must be used** and only shared with those who need it for their work.
- 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 found to be out of date, it should be deleted if electronic and shredded if paper.
- Employees **should request help** from the data protection officer if they are unsure about any aspect of data protection.
- Be on the **alert for scam emails**. **Always check with other members of staff** if in any doubt.
- If a **data breach is suspected** staff are to inform the data protection officer.

Data Storage

These rules describe how and where data is safely stored when not being used to perform necessary processes for legitimate/contractual reasons.

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

- When not required, data relating to staff personal details should be kept **in a locked drawer or filing cabinet**.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer, desk or kitchen/toilet areas.
- **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 hacking attempts:
- Data should be **protected by strong passwords** that are changed regularly and never shared unless necessary to fulfil work.
- If data is **stored on removable media** (like a CD or DVD), these should be kept in a secure place when not being used.

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- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services**.
- Servers containing personal data should be **sited in a secure location**.
- 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 servers and computers containing data should be protected by **approved security software and a firewall**.

Data Use

These rules describe how data is safely processed when being used to perform necessary legitimate tasks.

- When working with personal data, employees should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be **encrypted before being transferred electronically**. The IT manager can explain how to send data to authorised external contacts.
- Personal data should **never be transferred outside of the European Economic Area**.
- Employees **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.
- Customer and suppliers 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.
- 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.

Obtaining consent

This applies to all prospective customers and suppliers with whom there is no present contract. The contact will be emailed, with privacy policy attached, to ask for confirmation, via email, that their details may be stored.

Access requests

All individuals who are the subject of personal data held by Alan Browne Lapping 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**.
- Request data **to be erased**.

Disclosing data for other reasons

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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, Alan Browne Lapping will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

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