

General Data Protection Regulation Policy

Context and overview

Key Details

- Approved by Director on: 1st April 2018
- Policy became operational on: 25th May 2018
- Next review date: May 2019

Introduction

Isca Forwarding 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 GDPR standards – and to comply with the law.

Why this policy exists

The general data protection regulation policy ensures Isca Forwarding Ltd

- Complies with the GDPR law and follows good practice.
- Protects the rights of staff, customers and suppliers.
- Is open about how it stores, processes and deletes individuals' data.
- Protects itself from the risks of a data breach.
- Ensures that consent is obtained before data is used for contact, correspondence or marketing purposes.

GDPR Law

The General Data Protection Regulation 25th May 2018 describes how organisations – including Isca Forwarding Ltd – 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 not disclosed unlawfully.

The GDPR is underpinned by these six important principles. These state that personal data must:

1. Be processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Be collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes.
3. Be adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed.

4. Be 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 rectified without delay.
5. Be kept in a form which permits identification of data subjects for no longer than is necessary for the purpose of 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.
6. Be 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.

People, Risks and responsibilities

Policy Scope

This policy applies to:

- The office of Isca Forwarding Ltd.
- All staff and volunteers of Isca Forwarding Ltd.
- All contractors, suppliers and other people working on behalf of Isca Forwarding Ltd.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the General Data Protection Regulation 2018. 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 Isca Forwarding Ltd from some very real data 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.
- **Failure to obtain consent.** For instance, repeatedly emailing or using an email address to send or forward information without their consent to do so.
- **Denying access to data.** For instance, refusing when asked to hand over personal data to an individual within the required time frame.
- **Neglecting to delete data.** For instance, holding onto personal data when it is no longer required, allowing it to be used in a manner not related to its original purpose.

Responsibilities

Everyone who works for or with Isca Forwarding Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

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

However these people have key areas of responsibility:

- The Director is ultimately responsible for ensuring that Isca Forwarding Ltd meets its legal obligations.
 - Dealing with requests from individuals to see the data Isca Forwarding Ltd holds about them (subject access requests).
- The data protection officer is responsible for:
 - Keeping the director updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and relating policies, in line with an agreed schedule.
 - Arranging data protection training and advice for the people covered by this policy, including annual staff training.
 - Handling data protection questions from staff and anyone else covered by this policy.
 - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- The manager is responsible for:
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - Evaluating any third- party services the company is considering using to store or process data. For instance, cloud computing services.
 - Approving any data protection statements attached to communications such as emails and letters.
 - Addressing any data protection queries from journalists or media outlets like newspapers.
 - Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.
 - Ensuring all communication follows the guidelines regarding an “opt in and opt out” of data usage for customers, suppliers and public.

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 it from their managers.
- **Isca Forwarding Ltd will provide training** to all employees to help them understand their responsibilities when handling 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 found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees **should request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection in accordance with GDPR.
- Data should be **deleted when it is no longer required** for purpose or it should be depersonalised if the information surrounding the personal data is required for records and archiving.

Data Storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the data controller.

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 paper and print outs are **not left where unauthorised people could see them**, like on a printer.
- **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 (every 6 months) and never shared between employees.
- If data is **stored on removable media** (Like removable hard drives), these should be kept locked away securely when not being used. For example in a locked safe.
- 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**, away from the general office, for instance, the director's office.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's standard back up 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

Personal data is of no value to Isca Forwarding 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 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 Manager can explain how to send data to authorised external contacts.
- Employees **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.

Data Accuracy

The law requires Isca Forwarding 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 Isca Forwarding Ltd should put into ensuring its accuracy.

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

- Data will be held in **as few places as necessary**. Staff should not create any unnecessary data sets.
- Staff should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.
- Isca Forwarding Ltd will make it **easy for data subjects to update the information** Isca Forwarding Ltd holds about them, For instance via email.
- 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.
- It is the manager's responsibility to ensure **marketing databases are checked against industry suppression files** every six months.

Subject access requests

All individuals who are the subject of personal data held by Isca Forwarding Ltd 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 general data protection regulations.
- Be able to ask the data that is no longer relevant or has been changed be removed from their file.

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

Subject access requests from individuals should be made by email, addressed to the director at jackie@isca-forwarding.co.uk. They will then receive a standard request form which they can use to make the request.

The director will then aim to provide the relevant data within one month of the request.

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

Disclosing data for other reasons

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

Under these circumstances, Isca Forwarding Ltd will disclose requested data. However, the director will ensure the request is legitimate, seeking assistance from the company's legal advisors where necessary.

Providing information

Isca Forwarding Ltd 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.
- How their data is being stored.

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