

# **Heronstone Engineering LTD**

## **T/A Harlech Tools**

### **GDPR & Privacy Policy**

#### ***GDPR Background Information and Description***

The General Data Protection Regulation (25<sup>th</sup> May 2018)

The GDPR's focus is the protection of personal data, Individuals must be informed that they have the following (non-exhaustive) rights:

- To complain to supervisory authorities. (ICO in the UK)
- To withdraw their consent to processing of their personal data.
- To access their personal data and have it rectified or erased. (The right to be forgotten)
- To be informed of the existence of any automated personal data processing.
- To object to certain types of processing.
- To be told how long their personal data will be held for.
- To be provided with details of any appointed data protection officer.

Consent from the individual is required. Consent must be given by affirmative action, i.e. a signed statement from the individual specifying what data has been collected and what it is to be used for. This means that separate consents are required for different data processing operations.

Finally, it must be easy for an individual to withdraw their consent at any time. Previous consents should be revisited to make sure they comply with the new regulations.

#### ***Scope of GDPR***

Heronstone provides secure system of storage for each employee and customer data through the SAGE system, secure computer and server systems with power supply back up as to not lose or corrupt data. Password protected user accounts with antivirus and group policy. The establishment, maintenance and continuous improvement of a safe working system to handle Employee and customer data from being collected to being stored and to provide easy, hassle free communication regarding the relevant data held by Heronstone. Tailored consent forms are produced to suit the needs and inform the recipient of what information is collected and used for. Risk assessments carried out prior to the collection and storage of data in the form of a Data Documentation Controller.

## ***Collection of data***

Each category of data that Heronstone holds or collects must be entered into the Data Controller Document. The Document acts as a risk assessment, If the Document cannot be filled in fully then the data cannot be collected.

- The Data Controller Document must be filled in fully.
- Based on the Data Controller Document the data might (such as requirement for contract) may not need consent but classified as a legitimate interest. Some data is required by law.
- There must be a lawful basis for collection of the data.
- There must be secure storage (locked under 2 keys / stored on protected computer system).
- If required, consent must be given freely.

## ***What data is collected***

The data Heronstone collects is as follows:

- Company and personal contact details, this can include but is not limited to, Email, Address, Name and phone number.
- Bank, pension and tax details, for payment purposes and to be able to fulfil contract terms with employees.
- Inhouse and external training is recorded for the purposes of ISO standard and Health and Safety.
- Health surveillance is undertaken for the improvement of working conditions within the company.
- Emergency contact details are recorded.
- Annual leave details and sick leave details are recorded.

## ***Use of collected data***

Each category of data must be input into the Data Controller Document, This Document specifies the use of the data. Data cannot be used for a different purpose other than stated in the Controller Document.

- Heronstone does not undertake marketing campaigns.
- Contact details are required for the ease of communication, Fulfilment of contract terms and information transfer about jobs and tasks the company undertakes.
- Bank, Pension, Sick leave and tax details are required by law, (HMRC and Payee)
- Bank / payment details are used to pay companies.
- Annual leave details are recorded for contract purposes.

## ***Storage of collected data***

The majority of personal and company data is stored electronically. Although Heronstone still utilizes paper-based storage systems.

The electronically stored data is protected by multiple steps:

- A group user policy, restricting the running of programs on individual computers.
- Antivirus systems protecting the central server and individual computers.
- Password protected user accounts.
- Administrator locks on changes to programs.
- Daily backups of data carried out automatically.
- SAGE with restricted user accounts to handle vast majority of data.
- ITCS as IT support specialist (GDPR Compliant)
- SAGE Support (GDPR Compliant)

The paper-based system is as follows:

- Paper-based data is stored within offices.
- The "2 Key" System putting two locks between data and accessing it.
- Filing systems are in place to easily find stored data.
- Restricted access to offices with personal information.

## ***Who the data is shared with***

Heronstone does not sell or send data to a 3<sup>rd</sup> party.

- Heronstone does not sell any data.
- Heronstone only shares data if required by law. (HMRC)
- Heronstone enlists the help of 3<sup>rd</sup> parties to protect data but does not give access to it.
- Heronstone needs a written request or consent from the owner of the data to share it with a 3<sup>rd</sup> party.

## ***Your rights regarding your data***

Your rights are outlined by GDPR and covered in the background information, although some data is required to be kept by Heronstone so that we can comply with HMRC.

If you would like to request what information Heronstone holds on you / your company, or have any other questions, please contact us at: [info@harlech-tools.co.uk](mailto:info@harlech-tools.co.uk)