

# CHESTER REPAIR CENTRE (2018) LTD

## Data Protection Policy (including GDPR)

The General Data Protection Regulation (GDPR) is the new regulation introduced by the EU which became effective on May 25<sup>th</sup> 2018. The purpose of the new regulation is to give the public control of their data, as well as encouraging businesses to be more proactive in protecting and handling data in a more secure way. This document has been created so that CRC (2018) Ltd complies with this regulation.

### **Introduction**

As a company that holds and processes personal information about its customers, CRC(2018) Ltd is legally obliged to protect that information under the Data Protection Act. With regard to this information, CRC(2018)Ltd:

- Only collects information that is needed for a specific purpose;
- Ensures all information is held securely;
- Ensure the information is relevant and kept up to date as far as is feasible;
- Only hold as much information as is required, and only for as long as it is needed; and
- The company allows the subject of the information to see it on request

### **Definitions**

Company purposes: The purposes for which personal data may be used by the Company. This is to facilitate the operation of a Shop and Repair Centre. This will include collection of name and contact details to facilitate providing a repair service for your item.

### **Scope**

This policy applies to all CRC(2018)Ltd directors and staff, and may be supplemented or amended by additional policies and guidelines from time to time.

### **Fair and lawful processing**

The company must process personal data fairly and lawfully in accordance with individuals' rights. This means that personal data should not be processed unless the individual whose details are to be processed has given consent.

CRC(2018) Ltd Responsibilities:

- Reviewing all data protection procedures and policies on a periodic basis;
- Responding to individuals who wish to know what data is being held on them by CRC(2018)Ltd.
- Ensure all systems, services, software and equipment meet acceptable security standards;
- Ensuring security hardware and software are appropriately scanned on a regular basis.

The Processing of all Data must be:

- Necessary to deliver the service;
- In the legitimate interests of the company and not unduly prejudice an individual's privacy;

CRC(2018)Ltd have a Privacy Policy which

- Sets out the purposes for which CRC(2018)Ltd hold personal data on individuals;
- Provides that individuals have a right of access to the personal data that the company holds about them.

### **Accuracy and Relevance**

CRC(2018)Ltd will ensure that any personal data processed is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. The company will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this. Individuals may ask that CRC(2018)Ltd corrects inaccurate personal data relating to them.

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## Data Security

CRC(2018)Ltd staff members must keep personal data secure against loss or misuse, in line with the guidance below with storing data securely.

### Storing Data Securely

- In cases when data is stored on printed paper, it should be kept in a secure place
- Printed data should be shredded when it is no longer needed;
- Data stored on a computer should be protected by strong passwords that are changed regularly and through the use, on the PC upon which the data is stored, of proprietary, recognised secure malware and virus protection software. This must be kept up to date;
- Data stored on CDs or memory sticks must be locked away securely when they are not being used;
- All digital storage devices containing personal data must be password protected and secure;
- All staff members will sign a declaration of confidentiality.

## Data Retention

CRC(2018)Ltd will not store personal data for any longer than is necessary.

## Transferring Data Internationally

There are restrictions on international transfers of personal data. CRC(2018)Ltd does not intend to transfer any such data in this way.

## Subject Access Requests

Under the Data Protection Act 1998, and any legislation that subsequently updates it, individuals are entitled, subject to certain exceptions, to request access to information held about them.

All subject access requests must be referred immediately to the Company Secretary.

## Processing Data in Accordance with the Individual's Rights

CRC(2018)Ltd will not send direct marketing material to any third party.

## GDPR provisions

Where not specified previously in this policy, the following provisions will be in effect.

### Conditions for Processing

CRC(2018)Ltd will ensure any use of personal data is justified using at least one of the conditions for processing, (the six conditions are set out in the following section) and this will be specifically documented. The conditions for processing will be available to data subjects in the form of a privacy policy.

### Justification for personal data

CRC(2018)Ltd will process personal data in compliance with all six data protection principles. Any processing is based on the principles that can be found in Article 5(1) GDPR.

1. Lawfulness, fairness and transparency.  
Any personal data is processed in a lawful, fair and transparent manner in relation to data subjects. Transparency implies that any information and communication concerning the processing of personal data must be easily accessible and easy to understand, using clear and plain language. This principle will ensure that the data subject receives information on the identity of controllers and purposes of the processing of personal data.
2. Purpose limitation.  
Personal data is to be collected only for specified, explicit and legitimate purposes and it is not allowed to process them further in a way that is not compatible with those purposes. Further processing for the purposes of the public interest, scientific or historical research or statistical purposes is not considered as incompatible with the initial purpose and is therefore allowed.

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3. Data minimisation.  
Personal data must be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed. Data cannot be processed unless it is needed to be processed in order to achieve the above-mentioned purposes.
4. Accuracy.  
Personal data is accurate and kept up to date where necessary. Personal data that is inaccurate – considering the purposes for their processing – must be deleted or rectified without any delay.
5. Storage limitation.  
Personal data must be kept in a form that makes it possible to identify data subjects for no longer than is necessary for the purposes of the processing. Storing data for longer periods is allowed when the processing of the data will aim at achieving purposes in the public interest, scientific or historical research purposes or statistical purposes. In these cases rights and freedoms of data subjects must be safeguarded.
6. Integrity and confidentiality.  
In the processing of personal data appropriate security of personal data is ensured. This should include protection against unauthorised or unlawful processing, destruction and damage. Appropriate technical or organisational measures are to be taken in order to comply with this requirement: such data security measures can include the use of encryption and authentication and authorisation mechanisms.

## **Consent**

The data that is collected by CRC(2018)LTD is subject to active consent by the data subject. This consent can be revoked at any time.

## **Data Portability**

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be carried out at no cost.

## **Right to be Forgotten**

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

## **Privacy by Design and Default**

Privacy by design is an approach to projects that promote privacy and data protection compliance from the start. A CRC(2018)Ltd Director will be responsible for conducting Privacy Impact Assessments and ensuring that all IT projects commence with a privacy plan. When relevant, and when it does not have a negative impact on the data subject, privacy settings will be set to the most private by default.

## **Reporting Breaches**

Any compliance failure will be notified to the Company Secretary to take the following action:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the Supervisory Authority (ICO) of any compliance failures that are material either in their own right or as part of a pattern of failures

## **Monitoring**

All CRC(2018)Ltd staff members must observe this policy which will be monitored on a continuous basis by the Directors at each meeting.