Poplar Services Printers Limited
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General Data Protection Regulation Policy (GDPR)

Context and overview

Key details

- Audit and Policy prepared by: Martin Winders
- Approved by board / management on: 17th May 2018
- Policy became operational on: 17th May 2018
- Next review date: 17th May 2021

Information Commissioners Office (ICO) Reg No: ZA321641
Contact details for the ICO: https://ico.org.uk
Visit the ICO website or call 0303 123 1113 for more details.

Introduction
The EU General Data Protection Regulation (GDPR) replaces the Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens data privacy and to reshape the way organizations across the region approach data privacy.

When is the GDPR coming into effect?

The GDPR was approved and adopted by the EU Parliament in April 2016. The regulation will take effect after a two-year transition period and, unlike a Directive it does not require any enabling legislation to be passed by government; meaning it will come in to force on the 25th May 2018.

Who does the GDPR affect?

The GDPR not only applies to organisations located within the EU but it will also apply to organisations located outside of the EU if they offer goods or services to, or monitor the behaviour of, EU data subjects. It applies to all companies processing and holding the personal data of data subjects residing in the European Union, regardless of the company's location.

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What constitutes personal data?

Any information related to a natural person or 'Data Subject', that can be used to directly or indirectly identify the person. It can be anything from a name, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer IP address.

What are the main changes?

Increased Territorial Scope (extra-territorial applicability)
Arguably the biggest change to the regulatory landscape of data privacy comes with the extended jurisdiction of the GDPR, as it applies to all companies processing the personal data of data subjects residing in the Union, regardless of the company's location. Previously, territorial applicability of the directive was ambiguous and referred to data process 'in context of an establishment'. This topic has arisen in a number of high profile court cases. GPDR makes its applicability very clear - it will apply to the processing of personal data by controllers and processors in the EU, regardless of whether the processing takes place in the EU or not. The GDPR will also apply to the processing of personal data of data subjects in the EU by a controller or processor not established in the EU, where the activities relate to: offering goods or services to EU citizens (irrespective of whether payment is required) and the monitoring of behaviour that takes place within the EU. Non-Eu businesses processing the data of EU citizens will also have to appoint a representative in the EU.

Penalties

Under GDPR organizations in breach of GDPR can be fined up to 4% of annual global turnover or £14 Million (whichever is greater). This is the maximum fine that can be imposed for the most serious infringements e.g. not having sufficient customer consent to process data or violating the core of Privacy by Design concepts. There is a tiered approach to fines e.g. a company can be fined 2% for not having their records in order (article 28), not notifying the supervising authority and data subject about a breach or not conducting impact assessment. It is important to note that these rules apply to both controllers and processors -- meaning 'clouds' will not be exempt from GDPR enforcement.

Consent

The conditions for consent have been strengthened, and companies will no longer be able to use long illegible terms and conditions full of legalese, as the request for consent must be given in an intelligible and easily accessible form, with the purpose for data processing attached to that consent. Consent must be clear and distinguishable from other matters and provided in an intelligible and easily accessible form, using clear and plain language. It must be as easy to withdraw consent as it is to give it.

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Data Subject Rights

Breach Notification

Under the GDPR, breach notification will become mandatory in all member states where a data breach is likely to "result in a risk for the rights and freedoms of individuals". This must be done within 72 hours of first having become aware of the breach. Data processors will also be required to notify their customers, the controllers, "without undue delay" after first becoming aware of a data breach.

Right to Access

Part of the expanded rights of data subjects outlined by the GDPR is the right for data subjects to obtain from the data controller confirmation as to whether or not personal data concerning them is being processed, where and for what purpose. Further, the controller shall provide a copy of the personal data, free of charge, in an electronic format. This change is a dramatic shift to data transparency and empowerment of data subjects.

Right to be Forgotten

Also known as Data Erasure, the right to be forgotten entitles the data subject to have the data controller erase his/her personal data, cease further dissemination of the data, and potentially have third parties halt processing of the data. The conditions for erasure, as outlined in article 17, include the data no longer being relevant to original purposes for processing, or a data subjects withdrawing consent. It should also be noted that this right requires controllers to compare the subjects' rights to "the public interest in the availability of the data" when considering such requests.

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Audit of data processing

Poplar Services Printers Ltd and Betterprint Ltd will hold a record within this policy folder to track all data processing requests.

This is compulsory and must be kept up to date for every order that requires any element of data processing.

This will raise the awareness within the team at the time of the order and will track each and every time we process any data whether that be on a customer's request or for our own use.

Poplar Services Printers Ltd and Betterprint Ltd from time to time use Microsoft Excel as the software to hold the data that is then personalised onto a customer's artwork. The data file is always to be supplied to us encrypted. If the file arrives to us non-encrypted we will firstly encrypt and advise the customer accordingly. The main software used for personalisation is Adobe InDesign. We create a folder and place everything used for this order inclusive of the data within. This folder is then secured with a password that only the operator and Martin Winders will know. We create a PDF of the personalised file and use secure FTP to proof to our clients. On approval this file is then ripped over to the production press and ready for printing. Our press operators at this point will be made aware of a data sensitive order and will act accordingly putting into action line clearance procedures and ensuring no other persons are in the vicinity as per the company's Data Protection Policy. After completion of the print run the job is then deleted off the press immediately. Any over run sheet or extra is shredded and treated as per our sensitive printed sheets procedure within the Data Protection Policy. On delivery on the order and customer acceptance the data file within the encrypted folder is then removed from our system and completely deleted. At this point we hold no personal data for the clients print run.

Review of audit:
Having audited our data processing processes I feel we operate a very low risk to data breach and public data safety. I will be holding a meeting to discuss this and ensure all staff members are aware of the sensitiveness and our commitment to data protection and security. This procedure will be monitored, reviewed and if required modified to ensure the best possible actions are taken to ensure data protection at all times.

Personal data

The only personal data held on site is that of our staff, accounts, customer orders and repeat customers.

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Staff:
Details on staff are held for both health and safety purposes and to enable the company to honour its part of the employees terms of employment. Any staff member can, at any time request full details of what personal information the company holds from Martin Winders and these will be given within 14 days as per our Data Protection Policy.

Accounts:
The company holds both personal and company details to enable it to conduct it's business. The company does not make it its business to hold un-necessary or exhaustive details of suppliers and customers beyond what is required to conduct the day-to-day business.

Customer Orders:
As per the audit the only personal data on site will be that during a particular order that contains a data aspect. Poplar Services Printers Ltd and Betterprint Ltd operatives must follow the Data Protection and GDPR procedures as noted within the audit and can consult Martin Winders if at all in any doubt.

Repeat Customers:
Poplar Services Printers Ltd and Betterprint Ltd hold details of orders placed purely to help ease the process of re-order and repeat ordering. This storage is within our secured server behind the security processes already mentioned with firewall and virus protection. The information we will hold will contain:

- Customer name
- Customer address
- Customer contact details
- Previous order details
- … plus any other item of information that helps in the re-order process.

Poplar Services Printers Ltd and Betterprint Ltd do not store any payment details and will not store any payment details.

Payments
Poplar Services Printers Ltd and Betterprint Ltd accept payment by both phone and via SagePay and Paypal online. When payments are taken via phone team members record the payment details and authorize the payment. It is then procedure for the details to be shredded instantly as we do not store any payment details. Online orders are taken via SagePay and Paypal therefore we receive no details of payments. Sage and Paypal look after this security and we feel confident our customers are well protected partnering with these large facilities.

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Review of personal data:
Having reviewed our Personal Data processes and given we do not send any personal data to any third party unless explicitly asked to do so during a customers order, I am happy that our procedures comply with GDPR regulation for Data Processing. Our personal data is only used to help assist the day to day running of our business and aid our customers to an easier order process by storing their order history.

Accountability

Poplar Services Printers Ltd and Betterprint Ltd operate a strict Data Protection Policy and this has been reviewed in line with the inception of GDPR. I feel it adequate to review this policy every 5 years unless there is reason to report to a third party when this will instantly trigger a review.

Data Protection Officer (DPO)

Poplar Services Printers Ltd and Betterprint Ltd have appointed Managing Director: Martin Winders as the most appropriate person to be in charge of data protection. This is backed up with (CSM) Customer Services Manager: Gareth Holt who is duly responsible for reporting any breach both to the DPO and Information Commissioners Office.

Management Responsibility

The management will work with all team members to ensure all parts of this policy are understood and therefore carried out in the correct manner. The management will support all staff members to promote a positive culture of data protection compliance across the business.

Information Risks and Data Protection Impact Assessments (DPIA)

Poplar Services Printers Ltd and Betterprint Ltd will require the Data Controller to complete a Data Protection Impact Assessment prior to commencing a new contract (Where the circumstances require one to be completed). Our DPO will assist the data controller to mitigate any risks identified.

Operating from a single site with a core team of staff we feel the risk regarding data protection to be low. All staff work within our GDPR and Data Protection Policy.

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If after carrying out a DPIA we find the risk to be high and find there is nothing we can do to mitigate the risk we will immediately inform the Information Commissioners Office. We will not and cannot commence with any further processing until we have done so.

Our DPIA must:

- describe the nature, scope, context and purposes of the processing;
- assess necessity, proportionality and compliance measures;
- identify and assess risks to individuals; and
- identify any additional measures to mitigate those risks

If in doubt the ICO will give written advice within eight weeks, or 14 weeks in complex cases.

Data Protection by Design

Poplar Services Printers Ltd and Betterprint Ltd will only ever process data on a Studio Apple Mac that is protected behind a server firewall and then further protected by Bitdefender or similar virus software. No hard copy prints will be made of the data from this system. The data will then be proofed to our clients via a secure method of secure File Transfer Protocol. Once approved the file will be ripped to one of our high production presses. At this point our production team will have been briefed that a sensitive printed document is present and therefore protocol will be followed and maintained at our usual highest level.

At all times we will look to minimise the use of the data and ripping time to further transparency measures to further help the business comply with our Data Protection Policy.

Training and Awareness

Poplar Services Printers Ltd and Betterprint Ltd trains all staff and ensures every member of staff has the appropriate awareness of the Data Protection policy. Training doesn't stop there. Training is ongoing and staff are briefed regularly and updated when sensitive jobs are due to come into the business. Any member of the team that feels their level of awareness or training is too low for them to carry out their duties is encouraged to speak to either the DPO or CSM. Due to us being a tight team and the DPO being close to all members it is not believed that any persons within the company fall into this category.
Data Processing Contracts

Poplar Services Printers Ltd and Betterprint Ltd sought prior written authorization from the data controller prior to engaging in the services of a processor. By way of

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contract we will take an email confirmation of order and written instructions as the mutually agreed contract. This is backed up with the (DPIA) Data Protection Impact Assessment if required for a particular client or situation.

The use of sub-processors

If there is a requirement to use a third-party on any order that is of sensitive nature then Poplar Services Printers Ltd and Betterprint Ltd must have sought written authorisation from the controller before engaging the services of a sub-processor.

Where possible all orders of a data sensitive nature will be carried out by our staff on our site under our control. The client will always be advised when this is not possible.

Operational Base

Poplar Services Printers Ltd and Betterprint Ltd operate from one location based at Poplar House, Jackson Street, St Helens, Merseyside WA9 3AP. There is no requirement at present to appoint an EU representative.

Breach Notification

It is the duty of Poplar Services Printers Ltd and Betterprint Ltd to inform the controller of any personal data breach 'without undue delay' after becoming aware of it. A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

The disclosure of personal data will not be tolerated by either Poplar Services Printers Ltd or Betterprint Ltd and will be treated as corporate misconduct and dealt with accordingly. All team members are aware of this and treat such jobs in the correct manner.

In the event of a breach the procedure is as follows:

- Inform the DPO: Martin Winders.
- If the DPO is not available inform the CSM: Gareth Holt
- The CSM's duty will be to inform the DPO straight away.
- The DPO will conduct an inquiry and seek evidence to understand the data breach and the severity of it.
- The DPO will inform the controller of the data breach and that there is an investigation under process.
- If the DPO can't resolve quickly or the severity is such then the controller will be made aware and kept informed and the ICO will be briefed and directions sought.

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- Both the DPO and CSM have authority to report to the ICO.

Even the smallest of data breach is to be reported to the DPO and documented. The company will list any report on the spreadsheet listing every job the company processes and evidence any findings/actions.

As above the companies will always keep the controller/client informed and will do the upmost to minimize the risk of any breach and bring the situation under control.

Right of Access

Poplar Services Printers Ltd and Betterprint Ltd operate a 'subject request access' service. This gives individuals the right to obtain access to their personal data; the right to know their data is being processed.

The DPO is responsible for dealing with 'subject access requests'. These will be responded to within 24hrs and after receiving confirmation that the subject is the subject requesting the information for which the DPO will carry out identification checks. A Subject Request Form will be sent for the subject to complete and after receiving this back and the payment of £10 (Subject Access Request Fee) the DPO will then respond with all data held on file within 10 days. For multiple requests the DPO will take a maximum of 2 months to complete a complex request.

A 'subject access request' area is available on the Poplar Services Printers Ltd website and we have also listed some best advice on how to contact us to make such request. We will always work with the subject to reassure and offer every piece of data that we have on a particular subject.

No personal data used from a clients processing is kept on site and is destroyed immediately on job completion.
Right to Rectification and Data Quality

Poplar Services Printers Ltd and Betterprint Ltd operate a 'subject request access' service. This gives individuals the right to obtain access to their personal data. This in turn allows for the subject to alert us to any inaccuracies and any changes that they would like to make. We will respond to all requests for changes to our data and will amend within one calendar month of the request being made.

The DPO will ensure these amends are made and the subject is kept informed at all times.

If any entry is disputed we will try to sort this out quickly with the subject and ensure the subjects details on file are those that are accepted fully by the subject.

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Right to Erasure, including Retention and Disposal

Poplar Services Printers Ltd and Betterprint Ltd will wholly allow for any personal subject that wishes to be forgotten, to be forgotten and all records will be deleted from our systems.

The only data we hold is that of order history and accounts history. This is for the mutual benefit of re-ordering and is business to business. We do not hold any EU Citizen data on file for any other purpose whatsoever.

As we don't canvass the public this is very low risk and the DPO will maintain this and will discuss with any request for erasure, retention or disposal.

All data used for the processing of customers files is immediately deleted and therefore does not require any further procedures.

Right to Restrict Processing

Poplar Services Printers Ltd and Betterprint Ltd will allow for any individual to have a right to block or restrict the processing of their personal data. As we only process data on a clients request / data supplied by a client we would take this instruction directly from them. In the very rare event that an individual should contact either company and request that we no longer process any data with their details we will respond to this within one calendar month and cease to process any data for this individual. We will also contact our client (the controller) on the individuals' behalf to request they remove the individuals' data from their source so no further data is processed with the individuals' data.

As we do not store the controllers personal data on our system for future processing the direct action for erasure will be for the controller to erase and not to resupply for processing.

Right to Data Portability

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.

All data will be provided to the individual or controller in an Excel Comma Separated Values format within one calendar month of receipt of request.

We will not transfer any person's data to any other business as we feel this leaves the individual in a weakened position. We will supply the individuals' data directly to the individual after we have confirmed their identity and then it is up to the individual

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whom they send that on to.

Information / Security Policy

Poplar Services Printers Ltd and Betterprint Ltd operates a strict security policy. All computers inclusive of servers and printing rips are sat behind fully encrypted firewalls. We operate Bitdefender for Business on all machines and virus and hacking attempt definitions along with malicious attacking threats are updated automatically as soon as any definition is available.

Keeping our IT systems safe and secure can be a complex task and does require time, resource and specialist expertise. We partner with B2B Ltd to look after our computer system and feel they offer a great service to help protect the integrity and security of our network. B2B Ltd is Microsoft approved and have dealt with Poplar Services Printers for many years now.

All computers are password protected. We also operate a Wi-Fi network that is heavily encrypted and only used for business purposes.

All machines are automatically updated as per manufacture updates to ensure security threats and updates are loaded on as soon as possible.

The DPO feels the network is as secure as it can currently be but will always remain mindful of new threats and new security procedures that can be adopted to further enhance the security of our IT infrastructure.

File Retention

Files will only be held on machines that are secured by firewalls and virus detection software. These files must only be stored whilst the job is being processed. On completion of the job this data is removed from the system and the individual operator will ensure no trace is left within their machine such as recent histories and recycle bins.

Whilst files are stored during order process, no machine is left unattended without being locked with a user password and secured within an encrypted folder. Martin Winders will advise of any procedure that any operator is unsure of and any procedural improvements that seem necessary.

Poplar Services Printers Ltd and Betterprint Ltd will only ever use data supplied by a customer for the purpose it is intended and will always only deal as a processer not a controller for such data. With that in mind the company will never use this data for any

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other purpose and will destroy the data after use. Any request from the customer to store such information will be rejected on the grounds of Data Protection and GDPR Regulations.

Neither Poplar Services Printers Ltd or Betterprint Ltd have ever sold any data that it holds and will confirm that it will never sell any data to any third party and will only ever use its data for its own business accounts and running of the business and that of processing its clients (Controllers) data.

Having audited and reviewed all procedures within Poplar Services Printers Ltd and Betterprint Ltd I feel in my role as Date Protection Officer and also as Managing Director of both businesses that we operate in a fair and decent manner and that we place no EU citizen in any harm whatsoever regarding Data Protection. If that was to ever change I feel we have procedures in place to deal with it swiftly and all staff members are fully aware of these processes. With that in mind as of __ day of May 2018 I can confirm we meet all guidance and requirements set out by the Information Commissioners Office and are therefore GDPR Compliant.