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GDPR & DATA PROTECTION POLICY

DEFINITIONS

For the purpose of this policy the below terms have the following meaning as defined by Data Protection Legislation or defined by Grosvenor House Papers Limited to remove any doubt or meaning.

GHP	Grosvenor House Papers Limited, Papermilldirect (a trading name of GHP) and any future trading names of GHP.
GDPR	General Data Protection Regulation (2018)
ICO	Information Commissioners Office
DPA	Data Protection Act (1998)
Personal Data	Data which relate to a living individual who can be identified from those data, or from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller.
Sensitive Personal Data	Data as defined by the ICO, including health conditions.
Data Subject	An individual who is the subject of the personal data

Data Controller	A person who (either alone or jointly in common with other persons) determines the purposes for which and the way any personal data are, or are to be, processed.
Data Processor	Any person (other than an employee of the data controller) who possess the data on behalf of the data controller.
Processing	The means of obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data.
Third Party	A person other than the data subject or data controller, or any data processor or other person authorized to process data for the data controller or processor.

POLICY STATEMENT

Grosvenor House Papers (GHP) is committed to implementing a policy which details the processes, procedures and best practices it undertakes to ensure that the rights and privacy of all individuals; including staff, customers, suppliers, visitors and others are protected.

Following the implementation of the General Data Protection Regulation (GDPR) on 25 May 2018, GHP has reviewed and amended its Data Protection Policy, ensuring that it meets obligations in accordance with those set out in the GDPR and the existing Data Protection Act (DPA).

The GDPR outlines new rules that data controllers must follow to ensure that they process data in a transparent, justifiable and lawful manner.

GHP needs to process certain information about its staff, customers, suppliers, visitors and other individuals including, but not limited to:

- Recruitment and employee inductions
- Payment of staff wages
- The administration of employee personnel files for HR purposes (this includes information of an employee's 'next of kin' in case of emergency)
- Health and hospital details, including 'Statement of Fitness for Work'
- Training qualifications and development courses
- Customer information for the processing of orders
- Customer information for the delivery of goods
- Customer information for providing company updates, offers, catalogues and price lists
- Customer information for optimizing our services
- Supplier information for raising orders
- Supplier information for collecting and receiving goods

GHP may also share certain information on the lawful basis of:

Contract – which means that data is processed to fulfil a contractual obligation. This applies when customers place an order and we use the data provided to process and deliver the goods and services.

Legitimate Interest – which means that data is reasonably processed in ways which the individual would expect. This will apply when we send out newsletters with company offers, catalogues and pricing. Individuals may opt-out from receiving newsletters and updates at any time, this will be covered in greater detail later in this policy.

More details on the lawful basis in which we process data can be found in the 'Lawful Basis for Processing' section of this policy.

Grosvenor House Papers is committed to ensuring all the personal data it collects is done so transparently, so individuals are aware which data we collect; is justifiable, so individuals are aware of why their data is collected, stored and used; and lawfully, in adherence with the GDPR and relevant data protection legislation.

COMPLIANCE & SCOPE

This policy applies to all employees, including the company owners, directors and managers. Any breach of this policy will be treated as misconduct and the individual(s) will be subject to the company's disciplinary procedures, which could result in dismissal.

For best practice, any data processors the company uses, will be expected to read this policy and actively provide their compliance.

Third parties which process personal data on GHP's behalf will be subject to a signed contractual agreement—where applicable—detailing their compliance to the GDPR, relevant data protection legislation and compliance with this policy.

This policy will be subject to continuous review to ensure the company's data management, processing and security procedures are compliant to GDPR and relevant data protection legislation. Amendments will be made as and when necessary to ensure compliance.

GENERAL DATA PROTECTION REGULATION (GDPR)

The GDPR comes into force on the 25th May 2018 and sets out new rules companies need to follow for the processing of personal data and the protection of individuals' rights. Company's must now actively demonstrate their commitment to processing data in a transparent, justifiable and lawful way.

RESPONSIBILITIES

GHP is the 'data controller', as defined in the GDPR. As a data controller, GHP is responsible for the personal data it obtains, stores and processes. GHP is a registered data controller on the ICO's register of data controllers, registration number: ZA004995.

It is the responsibility of all employees of GHP who process personal data to do so in adherence with this policy and data protection legislation.

Employees, customers, suppliers and any other individual who provide information to GHP are responsible for ensuring the information provide dis up-to-date an accurate.

GHP ensures that it meet its obligation as a data controller to adhere to the responsibilities as detailed in Article 24 of the GDPR.

DATA PROTECTION

Article 5 of the GDPR outlines the following data protection principles, which forms the basis of this GDPR & Data protection Policy. GHP will adhere to, and actively promote the following principles in its management of personal data through its business operations.

1. Data protection must be fairly and lawfully processed.

GHP ensures its employees are aware of the information it holds on them. All employees, customers, suppliers and other individuals' personal information is processed lawfully. GHP identifies the following legal basis for which it may collect, stores and processes personal data:

- 'Consent' for collecting personal data on application forms and induction forms;
- 'Contract', such as processing orders and delivering goods;
- 'Legitimate Interest' such as to pay employee wages, or provide company offers, or, where applicable
- 'Legal Obligation' if required to do so by law.

GHP may rely on one, all or other lawful basis, depending on the type of data collected and processed.

2. Personal information must be processed for limited purpose

GHP will inform all individuals of why their data is collected and how it will be used. For Employee's this is done so at their induction, in their contract of employment, in company policies, handbooks and privacy notices and when submitting new information.

For customers, suppliers and other individuals this is outlined in this policy, our Terms and Conditions and our online privacy policies.

3. Personal information must be adequate, relevant and not excessive

GHP will only collect personal data which is necessary or legal for the purpose in which it is obtained. Forms which require employee personal data will include GDPR notices. If GHP holds any irrelevant personal data, which it believes will no longer be necessary it will be destroyed. GHP will from time to time review its files and identify irrelevant data which will be destroyed immediately.

4. Personal information must be accurate and up to date

GHP ensures that reasonable steps are taken to ensure that the personal data it collects, and stores is accurate and up-to-date. Staff notices and reminders are used to ensure employee information is accurate and customers are encouraged to update their information if necessary. It is GHP's responsibility to act on any change to personal data, destroying the old data and replacing it with the new data.

5. Personal data must not be kept for longer than is necessary

GHP will only retain personal data that is relevant and justifiable. Personal data that is no longer relevant will be destroyed and any statutory requirements will be adhered to.

6. Personal information must be processed in line with the data subjects' rights

GHP will only process data subjects' information in line with the following rights:

- The right to be informed of what data GHP holds on the subject and how it is used;

- The right of access the data GHP holds on them;
- The right to rectify data that is inaccurate or incomplete;
- The right to erase data, where data is no longer necessary for the purpose originally collected for; if there is no overriding legitimate interest to processing the data; if the data is being processed unlawfully or if it is a legal obligation of GHP to erase the data;
- The right to restrict processing of their data, where applicable and in the best interest of both parties or if GHP is legally obliged to;
- The right to data portability, where applicable;
- The right to object to the processing of their data which processed base don Legitimate Interest, such a newsletters and email offers;
- Rights in relation to automated decision making and profiling, including indirectly obtaining personal information, predicting an individual's personal data and making decisions regarding their personal data on their behalf.

GHP will ensure that all the above rights of a data subject are upheld as fully detailed in Chapter III (Articles 12 to 23) of the GDPR.

7. Personal information must be secure

GHP will ensure appropriate and adequate measures are in place to securely store data, actively prevent the unlawful processing of data, mitigate accidental loss or damage to personal data and have procedures in place to prevent and handle data breaches.

8. Personal information must not be transferred to other countries without adequate protection

GHP will only transfer data outside the European Economic Area if the subject has given explicit consent to do so and if that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects.

LAWFUL BASIS FOR PROCESSING

This section gives further details on the lawful basis in which GHP collects, stores and processes personal data.

Consent

'Consent' means offering individuals real choice and control. Should GHP rely on Consent for the collection and processing of data it shall do so in accordance with Article 7 of the GDPR. GHP will use a positive opt-in box or a separate, clear and concise statement which demonstrates that the data subject has agreed to the provision of their personal data and is aware of why and how it will be processed.

What forms of Consent do GHP use?

GHP may rely on Consent when requesting sensitive data, such as those collected in health questionnaires which include an individual's medical conditions. The data subject has the right to withdraw their consent at any time. Please note that GHP will keep some sensitive personal data if it is in the best interest of the employee and GHP, such as medical conditions which may affect your work, or the company needs to know about in case of emergency.

Legitimate Interest

'Legitimate Interest' refers to data which is reasonably processed in the best interest of the data subject and ways in which you would generally expect from us as a company. GHP carries out sufficient assessments to decide whether processing a subject's data can rely on Legitimate Interest.

What Legitimate Interest do GHP Use?

Employees

GHP will process some employee information on the lawful basis of Legitimate Interest if it is in the best interest of both the employee and GHP. This includes:

- Bank details, National Insurance Number and date of birth for setting employees up on payroll so their wages can be paid
- Sensitive personal data if it affects an employee’s employment, job role or is needed in case of emergency
- Next-of-kin details for use in case of emergency

Customers

GHP and Papermilldirect, (a trading name under GHP), relies on Legitimate Interest to send newsletters, catalogues and price updates to its customers by email. This is justified on the basis that there is a clear benefit for both the customer and GHP: Our catalogues and prices are distributed via email and for many customers this is the only way in which they will have access to their up-to-date prices.

We may also share your personal data with our third-party processors to optimise our online services. Details on our third-party providers are available in the ‘Third Party Processors’ section of this policy.

Suppliers & other Individuals

GHP may use personal data collected from suppliers and other individuals to provide company updates—if justifiable and applicable—including, but not limited to, change of details notifications, raising queries and arranging deliveries.

Right to Object from Legitimate Interest Processing

All customers and suppliers have a right to object to their personal data being used under the basis of Legitimate Interest if it is not justified. Customers may unsubscribe from receiving emails containing price updates, catalogues and newsletters by clicking “Unsubscribe” at the footer of the email/ newsletter or by contacting customer support using the contact details provided in the final section of this policy.

Contract

'Contract' is personal data processed to fulfil a contract or agreement. This processing must be necessary and if GHP could reasonably do what they want to, without processing personal data, then this basis will not apply.

GHP relies on Contract as the basis for processing personal data for the following:

- Processing orders when placed in writing, verbally or online
- Delivering goods to fulfil an order (which forms a contract)
- Receipt of payment and making payments
- 'Supply' contracts with customers which involves the processing of personal data

Legal Obligation

The 'Legal Obligation' for processing personal data is relied on when there is a need to process information to comply with a common law or statutory obligation.

GHP will process data on the lawful basis of Legal Obligation if it is necessary for compliance with law, including:

- Processing personal data to comply with HMRC obligations;
- When adhering to timeframes for the retention of financial documents which involves processing or storing personal data;
- When there is a court order to do so, such as an attachment to earnings;

THIRD PARTY PROCESSORS

GHP may use third parties to process some of the personal data it collects.

Deliveries

GHP will provide personal data to its delivery providers to fulfil orders promised to the customer when accepting the order. All our delivery providers are committed to fulfilling their obligations under the GDPR and have provided sufficient evidence to GHP demonstrating this.

Payments

We may share your payment details with credit card companies and payment providers customer orders, so payments can be processed, and orders dispatched.

Digital Marketing

We have contractual agreements with 2 digital marketing providers, SQ Digital and A-Digital, who we work with to optimise our online services. Both providers have demonstrated they are committed to their obligations under GDPR and have signed agreements with GHP prior to the effective date of GDPR (25 May 2018) which guarantees that they can only process personal data as directed by GHP (the data controller).

Full details of all our online third-party processors can be accessed in our online privacy policies:

<http://www.ghpkendal.co.uk/Privacy-Policy-and-Cookies>

<https://www.papermilldirect.co.uk/information/terms-conditions>

SUBJECT ACCESS RIGHTS

Employees

Individuals have a right to access any personal data which GHP holds on them. Employees that wishes to exercise this right should contact the Finance Office either verbally or in writing. There will usually be no charge for these request and the individual's personal data will be provided promptly and within 30 days.

Customers, Suppliers & Other Individuals

Customers, suppliers and other individuals that wish to access their personal data can do so by using the contact details in the 'Contact' section of this policy. Prior to providing the individual's personal data, GHP will require a positive identification check. Personal Data will be provided promptly and within 30 days.

Receiving an Access Request

If an employee receives an access request they must inform their line manager immediately, the line-manager must then report the request to the Finance Office who will deal with the request.

CCTV

GHP operates CCTV in and around its premise for security reasons. CCTV is displayed in the main office and recordings are only accessible by authorised personnel and will only be processed in adherence with GDPR and data protection legislation.

Individuals have a right to access CCTV footage in which they are visible and identifiable. The footage will be provided within 30 days.

DATA BREACHES

As a data controller, GHP ensures that any person(s) who have access to personal data does not process them except on instructions from GHP, or unless they are required to by law.

Mitigating Personal Data Breaches

GHP implements the following measures to mitigate the likelihood of personal data breaches:

- Implementing a robust GDPR & Data Protection Policy, which is reviewed regularly and made available to all within its scope;
- Encouraging our employees, customers and suppliers to make themselves familiar with the GDPR and their obligations to it;
- Collecting data in a transparent, justifiable and lawful manner;
- Limiting data, where possible;
- Ensuring all data subject rights are upheld at all times;
- Securely storing data whether electronically and on paper;
- Carrying out data breach risk assessments;

- Ensuring third party processors are compliant with the GDPR and only processed as and how instructed by GHP.

Data Breach Procedure:

Although GHP takes the necessary measures to prevent data breaches it implements the following procedure, should a data breach be detected:

1. If an employee detects a data breach, they must inform the person(s) responsible for data protection immediately, currently the Contracts Manager. If the Contracts Manager is uncontactable then a relevant senior manager or director must be informed.
2. If one of GHPs data processors detects a breach they are obliged by contract or law to notify GHP without undue delay.
3. On detection of a data breach, GHP will, without delay, and no later than 72 hours after becoming aware, report the breach to the relevant authority, unless the breach is unlikely to result in a risk to the rights and freedoms of an individual.
4. If the breach is likely to result in high risk to an individual's personal freedoms and rights, GHP will communicate the breach to the subject without undue delay in adherence with Article 34 of the GDPR.
5. Any breach will be scrutinised in full. Details of the breach will be logged on file along with remedial action taken.
6. A risk assessment will be carried out to prevent future breaches and GHPs GDPR & Data Protection policy will be reviewed

CONTACT

Queries

If any individual has any queries regarding this policy they may contact the company Finance Office on 01359 726 161, or email info@ghpkendal.co.uk.

Access request

If an individual would like to request access to their personal data, they can call the company on 01539 726 161 and request to speak to the Finance Office or an HR representative; email

info@ghpkendal.co.uk with a subject line 'GDPR Subject Access Request'; or write to the company's address:

Grosvenor House papers Ltd
Westmorland Business Park
Kendal
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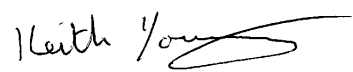
POLICY REVIEW

This policy was last reviewed on 22 May 2018 and is under continuous review and will be updated as and when necessary to ensure compliance with future legislation.

For further information on data protection, the General Data Protection regulation and Data Protection Act, please visit the ICOs website: www.ico.gov.uk.

POLICY IMPLEMENTATION NOTICE

This Policy is a statement by Grosvenor House Papers Limited and is authorised by:



Keith Young
Managing Director

ANNEX 1. POLICY REVIEW SCHEDULE

Name	Position	Date	Comment
J Radcliffe	Contracts Manager	22/05/18	Author of new Policy: V.1
