

General Data Protection Policy

Context and overview

Key details

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Policy became operational on:	15/05/2018
Next review date:	15/05/2020

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Introduction

Coggeshall Auto Repairs & Servicing Ltd needs to gather and use certain information about individuals.

These can include customer, 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 data protection standards, and to comply with the law.

Why this policy exists

This data protection policy ensures Coggeshall Auto Repairs & Servicing Ltd:

- Complies with data protection law and follow good practice
- Protects the rights of young people, parents and volunteers
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data

How we gather your data

Customers

When you book your vehicle in for repair – either by phone, email or telephone – we request the following information:

- Your name
- Your telephone number
- Your vehicle registration mark
- Your vehicle make and model

This information is stored in our paper diary and on the Sage accounting software application. Occasionally, you may wish to disclose an address to us which will be stored in the paper diary.

If you contact us by email, we may collect your email address. However, we do not store your email address anywhere other than within the Google Mail email application and we do not provide this to third parties.

Employees

When you become an employee of Coggeshall Auto Repairs and Servicing Ltd, we take the following information from you and store it in the Sage Payroll system:

- Your name
- Your address
- Your date of birth
- Your home address
- Your National Insurance number
- Your home telephone number
- Your tax code
- Your bank account number and sort code
- Your gender
- Your email address

We may also request a copy of your driving licence for our records, which will be stored on our secure computer. We will also share this information with HMRC for tax, PAYE and personal identification purposes.

Data protection law

The Data Protection Act 1998 describes how organisations - including Coggeshall Auto Repairs & Servicing 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 Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

People, risks and responsibilities

Policy scope

This policy applies to:

- The head office of Coggeshall Auto Repairs & Servicing Ltd

- All employees of Coggeshall Auto Repairs & Servicing Ltd
- All contractors, suppliers and other people working on behalf of Coggeshall Auto Repairs & Servicing Ltd

It applies to all data that the Company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names
- Home or work address
- Email addresses
- Telephone numbers
- Details of a customer's vehicle

Data protection risks

This policy helps to protect Coggeshall Auto Repairs & Servicing 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.

Responsibilities

Everyone who works for or with Coggeshall Auto Repairs & Servicing Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

Each person that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The data controller is Ian Manister who is ultimately responsible for ensuring that Coggeshall Auto Repairs & Servicing Ltd meets its legal obligations.

The data controller is responsible for:

- Reviewing all data protection procedures and related policies, in line with an agreed schedule
- Arranging data protection training and advice for the people covered by this policy where required
- Handling data protection questions from customers and employees, and anyone else covered by this policy
- Dealing with requests from individuals to see the data Coggeshall Auto Repairs & Servicing Ltd holds about them (also called 'subject access requests').

- Checking and approving any contracts or agreements with third parties that may handle the Company's sensitive data.
- 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, where required and where this is not already carried out by a 3rd party software provider
- Evaluating any third-party services the Company is considering using to store or process data. For instance, cloud computing services.

General Employee 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, Volunteers can request it from their line managers.
- Coggeshall Auto Repairs & Servicing Ltd will provide training to all volunteers to help them understand their responsibilities when handling data.
- Volunteers 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.
- Two-factor authorisation should be used wherever possible.
- 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.
- You must notify the Information Commissioner Office within 72 hours of any data breach, and you may also have to notify customers.

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 printouts are not left where unauthorised people could see them, like on a printer or open folder on a desk.
- 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 and never shared between Volunteers.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- 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 general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the Company's standard backup 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 Coggeshall Auto Repairs & Servicing Ltd unless the Company 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. Ritchie Hicks can explain how to send data to authorised external contacts.
- Personal data should never be transferred outside of the European Economic Area.
- 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 Coggeshall Auto Repairs & Servicing 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 Coggeshall Auto Repairs & Servicing Ltd should put into ensuring its accuracy.

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

- Data will be held in as few places as necessary. Employees should not create any unnecessary additional data sets.
- Employees should take every opportunity to ensure data is updated.

- Coggeshall Auto Repairs & Servicing Ltd will make it easy for data subjects to update the information Coggeshall Auto Repairs & Servicing Ltd holds about them. For instance, via the Company website.
- 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.

Your right to access information we store about you (Subject Access Requests)

All individuals who are the subject of personal data held by Coggeshall Auto Repairs & Servicing 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 data protection obligations

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

Subject access requests from individuals should be made by email, addressed to the data controller at:

Coggeshall Auto Repairs and Servicing Ltd
Units 9 & 9a Priors Way
Coggeshall
CO6 1TW

The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £10 per subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information. For example, requesting forms of photo identification such as a passport or drivers licence.

Disclosing data for other reasons

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

Under these circumstances, Coggeshall Auto Repairs & Servicing Ltd will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Company's legal advisers where necessary.

Your right to rectification

Individuals have the right to have their information corrected if they believe it is factually inaccurate – this is known as the right to rectification.

Your right to have data erased

The right to erasure is also known as 'the right to be forgotten'. In certain circumstances, it allows people to instruct organisations to delete or remove their personal data.

Your right to object

We do not sell information to any third parties, except for your vehicle details to the DVSA for MOT testing purposes. You have the right to object to the processing of your personal data at any time.

How long we keep your data

We only keep your data for as long as it is required, for example, to remind you that your vehicle is due for an MOT test.

Third party applications and their GDPR policies

Coggeshall Auto Repairs & Servicing Ltd use the following third party applications to store data or contact parents:

- Sage Payroll - <https://www.sage.com/en-gb/gdpr/>
- DVSA - <https://www.gov.uk/government/collections/your-data-and-how-we-use-it>
- HMRC - <https://www.gov.uk/government/collections/your-data-and-how-we-use-it>
- Google - <https://cloud.google.com/security/gdpr/>