

## DGPR Policy Statement

### Definitions

<b>WSL</b>	West & Senior Limited
<b>GDPR</b>	means the EU General Data Protection Regulation.
<b>ICO</b>	The Information Commissioners Office
<b>Responsible Person</b>	D I Brown - Financial Director

#### 1. Data protection principles

WSL is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

#### 2. General provisions

- a. This policy applies to all personal data processed and stored by WSL
- b. The Responsible Person shall have responsibility for WSL’s ongoing compliance.
- c. This policy shall be reviewed regularly.
- d. WSL has registered with the ICO as required.

### 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, WSL shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed regularly.
- c. Individuals have the right to see what personal data is held by WSL and requests made to the Responsible Person shall be dealt with in a timely manner.

### 4. Lawful purposes

- a. All data processed by WSL will be done on one the following lawful bases: contractual, legal obligation, vital interest, or legitimate interest.
- b. WSL shall note the appropriate lawful basis in the Register of Systems.

### 5. Data minimisation

WSL shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

### 6. Accuracy

- a. WSL shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

### 7. Archiving / Removal

- a. To ensure that personal data is kept for no longer than necessary, WSL shall put in place an archiving policy for each area in which personal data is processed and review this process regularly.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

### 8. Security

- a. WSL shall ensure that personal data is stored securely using propriety software which is regularly updated.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

### 9. Data Sharing

WSL will not share or transfer personal data unless there is a legal requirement to do so or a genuine operational need.

### 10. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, WSL shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

END OF POLICY

Last updated	18/05/2018
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