

Data Protection Audit

15 May 2018

How do the requirements of security, data protection, copyright and intellectual property legislation affect the production of Ovy Ltd. documents and data

Copyright and intellectual property legislation is designed to protect the creative interests or 'intellectual property' of those who create a product, and anyone who has invested in enabling its production. The GDPR imposes certain restrictions on the collection and use of personal data. If any document we are producing falls into any of the above categories, we will need permission from the individuals. This may include entering personal details onto a database, e.g. a mailing list. We need to ensure that all information is used lawfully and the individual has a right to access this information. We must inform the individual of the name of our business and what the information is going to be used for, and give them an opt out option before any documents have been compiled using the information.

To ensure your data is being processed correctly we have adopted the following principles:

We only collect and process your personal information if we have a legal basis for the processing under applicable laws, for example:

- We have collected your consent
- It is necessary to fulfil an agreement with you
- We legally are obliged to do so
- We have objective reasons and the processing does not harm you

We will always inform you of the processing and the purpose of the processing, unless we have a legitimate basis not to do so.

We will only process your personal information for the original purpose or for other purposes that are not incompatible with the original purpose. We will not store your personal information for longer than is necessary to serve the purpose for which the personal information was collected or further processed.

We will not disclose your personal information to other persons or companies outside of Ovy Ltd. unless you have given us your consent, unless we have an agreement with you or unless we are legally obliged to do so. Some printed items will be a 'Direct Delivery item'. This means that the item will be delivered direct from our supplier. On these occasions your delivery address, telephone number and contact name, will be sent to the supplier in question to enable them to deliver the goods. We will also supply our courier companies with a delivery address, telephone number and contact name to enable them to deliver the goods.

We strive to verify and update your privacy information on a regular basis.

We use physical, electronic and managerial procedures to safeguard and secure the personal information we process.

We do not knowingly collect personal data from anyone under the age of 18. If we are made aware that we have received information from anyone under the age of 18, we will use reasonable efforts to locate and remove that information from our records.

How do the requirements of security, data protection, copyright and intellectual property legislation affect the distribution and storage of data and documents

The GDPR states that appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. All information must be kept securely and where ever appropriate, up to date. You must not keep any personal data for longer than is required for the purpose.

How do we Process Personal Information

By "processing" we mean the collection, use, storage and at some point deletion of your data. Many of the services that we offer can only be made available if we have certain information about you. To access these services you will be asked to submit personal data about yourself. We will process the following personal information related to our services:

Contact Us or Creating An Account

We have a Contact Us page on our website enabling visitors to contact us to request information. When you do that, we ask for your name, email address and any message you want to provide. These details are forwarded to our team who will then contact you to respond as you have requested. We store those contact details in our local computers only for as long as is necessary to process your queries.

When you create an account on our website we process your registration details including your first name and surname, address, email address and telephone numbers. We retain your details in our local computer database, and our Quickbooks accounts system which is a secure passworded system.

You may correct, update and delete your registration account at any time.

Describe different types of distribution channels used within Ovy Ltd. There are many different types of distribution channels for documents in business, but there are a few which we at Ovy use regularly.

- Mail Shot – We may send the occasional mail shot by the postal service to a database of addresses. The database consists of both customers and non-customers. These are business to business addresses with no personal details.
- E Shot – A mailshot by e-mail is completed each month and sent to customers who have subscribed to our monthly newsletter. The recipients have an option to opt-out and the address to be removed from the database.
- E-mail. We use GMail for our e-mails. We regularly file e-mails into folders which removes them from the server and keeps a record on our local computer's. These folders are kept for 3 years and then deleted from the system.

- Meetings – Both internal and external, with employees and suppliers or customers. Documents will be distributed either prior to the meeting or as the meeting commences.
- Post – Any invoices which cannot be sent by e-mail, catalogue requests and any documents which require an original signature are sent by the postal service.

E-newsletters & Product Catalogues

- If you have consented to receive e-newsletters or marketing materials, by checking certain boxes on the forms we use to collect your data, we will process your personal information in order to carry out the service. Our e-newsletter and marketing materials address database is managed and updated by us.
- On most of our web site pages we provide you with an option to subscribe to our mailing list. This is an opt-in form where you provide your name and email address and then complete two constructive opt-in steps: you must tick a box to say you wish to receive updates about services or products, news, events and any other relevant information from Ovy Ltd. via e-mail, and you must then click the Subscribe button to submit your request.
- The details you enter are forwarded to our marketing team who then add you to the mailing list as per your request.
- You will then receive our updates by email. Those mailings do not go through our web site. At any time, and in each mailing, you have the option to alter or cancel your subscription to the list.
- You can remove your consent to receive marketing communications at any time by emailing info@ovydesign.co.uk

The types of information found in Ovy Ltd. and how long we keep these records.

Types of information found within an organisation will vary from business to business, but within our Company the information we hold is mainly details of customers, suppliers and personnel. The customer information we hold electronically, is the customer database which includes names, addresses and contact details. We also have any past purchase history. The information we hold for suppliers is very similar, but also includes any product prices. The product prices are stored electronically and also a hard copy in a manual filing system. These details are business details and not personal.

- **Job Applicants & Employees**

If you apply to work at Ovy Ltd., we will only use the information you supply to us to process your application. If we want to disclose information to a third party, for example where we want to take up a reference or obtain a disclosure from the Criminal Records Bureau we will not do so without informing you beforehand unless the disclosure is required by law. Personal information for unsuccessful candidates will be held, in line with our retention policy, for 2 years after the recruitment exercise has been completed. It will then be destroyed or deleted. Once a person is employed by Ovy Ltd., we will compile a file relating to their employment. The paper file will be kept in a locked cabinet. Any electronic data will be kept on the Personnel Department computer which is safeguarded with a password. Only

authorised personnel will be able to access the information. The information contained in these files will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with Ovy Ltd. has ended, we will retain the file, in accordance with the requirements of our retention schedule, for 7 years and then delete it. All paper based, personnel information is kept in a locked filing cabinet and only one person has access to all these records. Any electronic data is kept on the computer which is password protected. All personal information is made available to the individual employees if requested.

- **Consumer Details**

When placing an order online or over the telephone with our sales team, we will process your personal information (name, email, telephone number, invoice address and delivery address) so that we can fulfil your orders effectively and carry out any further obligations arising from contracts entered into between you and us. However, we will only use these details to provide the service which has been requested. We will also process historical order data for business purposes, in order to provide our customers with a better service and in line with our retention policy. In accordance with the compliance requirements, we keep information only for as long as necessary for each purpose, eg customers, subscribers to our mailing lists, and to meet statutory requirements in terms of employee and tax records.

- **Company Information**

We also keep Company information such as Company Accounts, insurances, bank account details etc. These are all kept in a locked filing cabinet.

How Ovy Ltd. Stores Data

The legal requirements for storing business information in our Company is a minimum of six years for all information relating to Invoices, VAT, company accounts and 3 years for PAYE, wages and income tax. Accident reports should be kept for a minimum of 3 years also. This information must also be kept easily accessible for any visit you may incur by a VAT inspector.

The records are kept in a safe and secure locked room, due to data protection laws and risk of fire or flooding.

Website and Analysing Visitor Statistics

When someone visits the Ovy Ltd. web site we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns automatically. This information is processed in a way which does not identify anyone. We do not make and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be upfront about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Social media

We use third-party providers, Facebook, Instagram, LinkedIn and Twitter to manage our social media interactions. If you send us a private or direct message, via social media, we will only use the information supplied to deal with your enquiry, any subsequent issues and for internal training and monitoring.

Security and performance

Although we will do our best to protect your personal data, we cannot guarantee the security of the data transmitted to our site; any transmission is at your own risk. Once we have received your information, we use strict procedures and security features to try and prevent unauthorised access.

In order to prevent unauthorised access or disclosure, we have in place physical, electronic and managerial procedures to safeguard and secure the information we process.

Cookies

Our Website uses cookies to distinguish you from other users of our Website and to keep track of your visits. They help us to provide you with the very best experience when you browse our Website and to make improvements to our Website. Cookies do not contain personal information such as your address, telephone number or credit card details. We do not exchange cookies with any third party websites.

How do we deal with Complaints

When we receive a complaint from a customer we compile a file containing the details of the complaint. This normally contains the identity of the customer, any other individuals involved in the complaint, and the reason for the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile statistics showing information like the number of complaints we receive and the reason for the complaint but not in a form which identifies anyone.

We may have to disclose the complainant's identity if the complaint is about a member of staff. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. In accordance with the compliance requirements, we keep information only for as long as necessary for each purpose, eg customers, subscribers to our mailing lists, and to meet statutory requirements in terms of employee and tax records. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Disclosure of personal information

Other than as identified below, we will not sell, distribute or lease your personal information to third parties unless we have your consent or are required by law to do so.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Ovy Ltd. or substantially all of its assets are acquired by a third party, in which case personal data held about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Ovy Ltd., our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Controlling & Accessing your Personal Information

If you have previously consented to us using your personal information for marketing purposes, you may change your mind at any time by emailing us at info@ovydesign.co.uk

You can find out if we are processing any of your personal information by making a request to the Data Protection Officer. We will

- give you a description of it;
- tell you why we are storing/processing it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request for details of your personal information held by us please write to the Data Protection Officer at Ovy Design, Heligan House, 21 Fairfield St, Bingham, Notts, NG13 8FB, or email info@ovydesign.co.uk We will respond within a week of receiving your request. This period may be extended for particularly complex requests.