

Data Protection Policy

Policy information	
Organisation	Willis Gambier (UK) Ltd
Scope of policy	<p>This policy Applies to Willis Gambier (UK) Ltd only.</p> <p>Companies Below – act on our behalf as data processors “in certain circumstances”</p> <p>Wincanton Logistics Bryan Adams Halley’s Transport Dennison’s Transport Panther Logistics Servico Group Home serve Furniture repairs ISM Furniture Services Fira Garrett Transport NetSuite Inc Grant Thornton EDI Right Angle Marketing Saker Computers</p>
Policy operational date	25 th May 2018
Policy prepared by	Willis Gambier (UK) Ltd
Date approved by Management	15 th May 2018
Policy review date	25 th May 2021

Introduction	
Purpose of policy	<p>The purpose of the policy is to set out Willis Gambier (UK) Ltd commitment and procedures for protecting personal data. Such as:</p> <ul style="list-style-type: none"> • complying with the law • following good practice • protecting clients, staff and other individuals • protecting the organisation <p>The company regards the lawful and correct treatment of personal information as very important to successful working and to maintaining the confidence of those with whom we deal with.</p>
Types of data	<p>Personal Data "in certain circumstances" Company Data</p>
Policy statement	<p>We are committed to a policy of protecting the rights and privacy of individuals. We need to collect and use certain types of data in order to carry out our work. This personal information must be collected and dealt with appropriately.</p>
Key risks	<p>Incorrect data entry Miss communication of data</p>

Responsibilities	
Management	Elliott Li and David Lane have responsibility for ensuring that the organisation complies with its legal obligations.
Data Protection Officer	<p>Elliott Li and Nicola Williams</p> <p>Their responsibilities include:</p> <ul style="list-style-type: none"> • Reviewing Data Protection and related policies • Advising other staff on tricky Data Protection issues • Ensuring that Data Protection induction and training takes place • Notification to the ICO • Handling subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Processors
Specific Department Requirements	Department managers will monitor their own departments and ensure they are complying with GDPR and they are required to report back to the DPO when required.
Employees & Volunteers	All staff and are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work at Willis Gambier (UK) Ltd
Enforcement	Under the GDPR, Supervisory Authority have a number of powers including to issue warnings of non-compliance, carry out audits, require specific remediation within a specified time frame, order erasure of data and suspend data transfers., SAs are also empowered to issue substantial administrative fines of up to 4% of total global annual turnover or €20m (whichever is the higher). All employees of the business will be informed on the new data protection policy and the penalties that we face if in some way breached. Any breach of the policy will be communicated to the data protection officer who will contact the ICO within 72hours of any breach.

Security	
Scope	<p>Willis Gambier (UK) Ltd shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk.</p> <p>Each employee is briefed on their level of authority and will only work within parameters given, reporting to management thereafter.</p>
Setting security levels	<p>An appropriate level of security shall be applied by Willis Gambier (UK) Ltd to all data processing tasks taking into account any risks that are presented by processing.</p>
Security measures	<p>The following security measures are in place at Willis Gambier (UK) Ltd</p> <ul style="list-style-type: none"> Door Security to work place IT Server protection through our IT Support Company Personalised Password security on Computer Personalised Password security on business software Data Specific processing allocated to dedicated staff Data can NOT be accessed by anyone other than Willis Gambier (UK) Ltd Employees except with authority to do so in certain circumstances.
Business continuity	<p>Willis Gambier (UK) Ltd have back up procedures in place to ensure recovery of data, which can be accessed through our IT Support company</p> <p>Willis Gambier will carry out a full IT security audit every 6 months in collaboration with our IT support contractor</p>
Specific risks	<p>Telephone Communication of Personal Data - No Contact Details may be taken over the phone – All must be in writing giving explicit consent</p>

Data recording and storage	
Accuracy	Willis Gambier (UK) Ltd will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about the subjects.. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.
Updating	We will review the data 6 monthly and will ensure that information is confidentially destroyed at the end of the relevant retention period. See below for retention periods for specified data.
Storage	<ul style="list-style-type: none"> • From May 2018 Willis Gambier (UK) Ltd will not retain any paper files of personal data, except for financial transactional data. • Willis Gambier will carry out a full IT security audit every 6 months in collaboration with our IT support contractor <ul style="list-style-type: none"> ○ Where financial transactional data is retained onsite it will be stored in a filing cabinet in a locked office building where only Willis Gambier employees can gain access. ○ Financial data from previous years will retained onsite in the company's locked warehouse ○ When processing financial information by telephone staff taking the call must not write down or record any of the information given to them. They must not repeat back any card details and if they require clarification they will ask the caller to repeat the details. • Any personnel data will be retained in a locked filing cabinet in a locked office with restricted access to authorised personal.
Retention periods	For all financial data this will be retained for 7 years For all personnel data this will be retained for 6 years (excluding CV's unless express permission – 6 months only)
Archiving	Data such as employees' personal records, performance appraisals, employment contracts, etc. should be held on to for 6 years after they have left. Under the GDPR, the condition for processing would be legal obligation, or legitimate interest.

Right of Access	
Responsibility	Nicola Williams and Elliott Li are responsible for ensuring that right of access requests are handled within a one month timescale.
Procedure for making request	<p>Right of access requests must be in writing and sent to: Ms Nicola Williams Willis Gambier (UK) Ltd Samson House Morley Way Peterborough PE2 7BW</p> <p>Or alternatively to nicola.williams@wguk.com</p> <p>All employees of the business have the responsibility of passing such requests to the relevant people/person.</p>
Provision for verifying identity	The company may have to check the individual's identity before handing over information; this may be by means of photographic ID.
Charging	All first requests for persona data will be free of charges unless the request is unfounded or excessive, particularly if it is repetitive. Any further copies of the same information will encounter an administration fee of £30.
Procedure for granting access	All requests submitted will be provided by post and recorded/signed for to ensure individuals receive the requested information.

Transparency	
Commitment	<p>A data controller must be able to demonstrate that personal data is processed in a transparent manner in relation to the data subject. These transparency obligations begin at the data collection stage and apply throughout the life cycle of processing.</p> <p>These rules stipulate that information or communication to data subjects must be concise, transparent, intelligible and easily accessible, and use clear and plain language. In other words, the information should not contain “overly legalistic, technical or specialist language or terminology.</p> <p>The data subject is entitled to receive the below information:</p> <ul style="list-style-type: none"> • Identify and contact details of the controller, his representative and data protection officer. • Intended purposes of processing, as well as the legal basis of the processing and the legitimate interests pursued by the controller or by a third party • The storage period for the data • The existence of the right to access, the right to rectification or erasure, and the right to object to processing. • The right to lodge a complaint with the national data protection authority and its contact details. • The recipients to whom the data will be disclosed.
Procedure	<p>to ensure the Data subject is informed, we will notify by the following means:</p> <ul style="list-style-type: none"> • the employee contract • during the initial meeting with customers • on the web site • included in mail shots
Responsibility	<p>The department managers will be responsible for transparency in relation to different types of data subject within their departments.</p>

Lawful Basis	
Underlying principles	<p>Processing shall be lawful only if and to the extent that at least one of the following applies:</p> <ul style="list-style-type: none"> • The data subject has given consent to the processing of his or her personal data for one or more specific purposes.- Apply to Willis Gambier (UK) Ltd Website Outlet Orders • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;- When Placing an order for Group Account Customers with a DHD Facility • Processing is necessary for compliance with a legal obligation to which the controller is subject; • Processing is necessary in order to protect the vital interests of the data subject or of another natural person; • Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; • Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
Opting out	<p>Willis Gambier (UK) Ltd gives any individual the opportunity to opt out of their data being used at any opportunity</p>
Withdrawing consent	<p>Willis Gambier (UK) Ltd – acknowledges that although the individual has once given, consent it can be withdrawn, but not retrospectively. There may be occasions where Willis Gambier (UK) Ltd has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn.</p> <p>Consent can be withdrawn in writing over email or in letter from to Samson House, Morley Way, Peterborough, PE2 7BW</p>

Employee training & Acceptance of responsibilities	
Induction	All new employees who will have access to any personal data will have their responsibilities outlined during their induction / training.
Continuing training	When departmental meetings occur, data protection issues will be discussed.
Procedure for staff signifying acceptance of policy	The data protection policy will be included in the Contract of Employment. For all current staff they will each have a copy of the policy which they will sign and date to signify acceptance of the policy.

Policy review	
Responsibility	Nicola Williams and Elliott Li will be responsible for carrying out the next policy review.
Procedure	The review will be on the agenda on monthly management meetings. All employees will be informed as ongoing process.
Timing	The review will begin in March 2021, in order for it to be completed by the required date.