

# Somac Threads Ltd Data Protection Policy

## Policy Statement

Somac Threads Ltd handles information about customers as part of its business procedures.

This personal information is handled properly and securely in the way it is collected, recorded, and used – whether on paper, in a computer, or recorded on other storage retrieval methods. The safeguards to ensure the safety of public data is detailed in the General Data Protection Regulation effective from 25<sup>th</sup> May 2018.

Somac Threads regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions, and to maintain confidence between those with whom it deals.

To this end Somac Threads Ltd fully endorses and adheres to the principles of Data Protection, as covered by the GDPR.

## Purpose

The purpose of this policy is to ensure that staff and management of Somac Threads Ltd are clear about the purpose and principles of Data Protection and to ensure that it has guidelines and procedures in place which are consistently followed.

## Principles

The GDPR regulates the processing of information relating to living and identifiable individuals (data subjects). This includes the obtaining, holding, using or disclosing of such information, and includes computerised records as well as manual filing systems and card indexes.

Data users must comply with the principles of good practice which underpin the Regulation. To comply with the law, information must be collected and used fairly, stored safely, and not disclosed to any other person unlawfully.

To do this Somac Threads Ltd follows the eight Data Protection Principles outlined in the GDPR, which are summarised below:

1. Personal data is processed fairly and lawfully.
2. Data is only collected and used for the purposes connected with the business of the company.
3. Data must be adequate, relevant, and not excessive.
4. Data must be accurate and up-to-date
5. Data must not be held any longer than is deemed necessary.

6. The rights of individuals to access their personal data is respected.
7. Data is kept safe from unauthorised access, accidental loss or damage

The principles apply to “personal data,” that is, information held in an electronic system or in manual filing systems from which they are identifiable. Somac Threads employees and managers who process or use any personal information in the course of their duties will ensure that these principles are followed at all times.

## **Procedures**

The following procedures have been developed in order to ensure that Somac Threads Ltd meets its responsibilities in terms of Data Protection. For the purposes of these procedures data collected, stored, and used by Somac Threads Ltd falls into 2 broad categories:

1. Somac Thread’s internal data records: Staff and management.
2. Somac Thread’s external data records: Members, customers, clients.

Somac Threads Ltd as a body is a Data Controller under the Regulation, and the Company Executive Committee is ultimately responsible for the policy’s implementation.

## **External data records**

### **Purposes**

Somac Threads Ltd obtains personal data (such as names, addresses, and phone numbers) from members/clients/customers. This data is obtained, stored and processed solely to assist staff and volunteers in the efficient running of services. Personal details supplied are only used to send material that is potentially useful. Most of this information is stored in the company’s database.

Somac Threads Ltd obtains personal data and information from clients and members in order to provide products and services. This data is stored and processed only for the purposes outlined in the agreement and service specification signed by the client/ member.

### **Consent**

Personal data is collected over the phone and using other methods such as e-mail. During this initial contact, the data owner is given an explanation of how this information will be used.

Written consent is not requested as it is assumed that the consent has been granted when an individual freely gives their own details.

Personal data will not be passed on to anyone outside the organisation without explicit consent from the data owner unless there is a legal duty of disclosure under other legislation.

Contact details held on the organisation's database may be made available to groups/ individuals outside of the organisation. Individuals are made aware of when their details are being collected for the database and their verbal or written consent is requested.

## **Access**

Only the organisation's staff and management normally have access to personal data.

All staff and management are made aware of the details of the GDPR and their obligation not to disclose personal data to a person who has no right to it.

Information supplied is kept in a secure filing, paper and electronic system and is only accessed by those individuals involved in the management and delivery of the service.

Information will not be passed on to anyone outside the organisation without their explicit consent, excluding statutory or legal bodies, e.g. the Inland Revenue.

All confidential post must be opened by the addressee only.

## **Accuracy**

Somac Threads Ltd take all reasonable steps to keep personal data up-to-date and accurate.

Personal data is stored for as long as the data owner/client/member uses our services and for as long as is reasonable in the running of our business.

Where an individual ceases to use our services and it is not deemed appropriate to keep their records, these records will be removed from the system.

If a request is received from an organisation or individual to remove their records, their details will be deleted from the database and all staff holding paper or electronic details for the organisation must destroy these accordingly.