



POLA TECHNICAL SOLUTIONS

## **POLA Technical Solutions Privacy and Data Policy - 2018**

### **0.1 Introduction:**

POLA Technical Solutions (POLATECHS, "us", "we") is committed to respecting the rights and freedoms of data subjects while complying with privacy and data protection laws. The personal client data we hold allows us to function as a business providing IT Support and advisory roles. This policy provides an explanation into the way in which

### **0.2 Definitions**

**Personal Data** - meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

Personal data that has been pseudonymised – eg key-coded – can fall within the scope of the GDPR depending on how difficult it is to attribute the pseudonym to a particular individual.

Special Categories of Personal Data - this data may include racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation

**Processing** - 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**Data Processor** - 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**Data Controller** - 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Law.



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### **0.3 Supervisory Authority**

POLATECHS works under the authority of the nation body responsible for data protection, ICO (Information commissioner's Office).

### **0.4 Principals**

The below principles are followed while POLATECHS process personal data

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

## **1.0 Data Policy**

### **1.1 Sharing Data**

POLATECHS retains client data to carry out the below business functions:

- Compliance with legal and regulatory obligations
- Company Accounts
- When required to fulfil contractual requirements
- Marketing
- Continual improvement of services offered

### **1.2 Data Held**

**Contact Information for Accounts** - includes First Name, Surname, Phone Number, Email & Address

**Licensing** - client software licence information for delivery of services

**Site Documentation** - includes client log on information, workstation naming convention, current software configuration.

**Marketing Data** - records of indication of interest in services provided by POLATECHS after consent has been granted

**Asset Management** - Information collected for documentation purposes and recommendations on client budget planning, data included: Make, Model, Serial number, Location, date of purchase, processor, ram, hard drive type and hard drive capacity.



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## **2.0 Retention of Records**

**Client Contact information** - collected from the client and stored after consent has been granted. Available for amendments to be made upon client request and will only be held for legal obligations or due to the fact that it is in our legitimate interest to do so.

**Marketing Information** - collected from the client and stored after consent has been granted. Opt out / unsubscribe options will included in all marketing communications and will be available for amendments / removal upon client request.

### **2.1 Data Held Upon cease of client relationship**

At the end of the client relationship / contract POLATECHS will remove any remote monitoring tools and destroy company equipment documentation including configuration details and passwords.

## **3.0 Protection of Records**

### **3.1 Data Subject Request Procedure (DSAR)**

#### **3.1.1 Data Request**

Upon receipt of a DSAR, the Data Protection Officer will log and acknowledge the request. The requestor may be asked to complete a Data Subject Access Request Form to better enable the Company to locate the relevant information.

#### **3.1.2 Identity verification**

The Data Protection Officer needs to check the identity of anyone making a DSAR to ensure information is only given to the person who is entitled to it. If the identity of a DSAR requestor has not already been provided, the person receiving the request will ask the requestor to provide two forms of identification, one of which must be a photo identity and the other confirmation of address. If the requestor is not the data subject, written confirmation that the requestor is authorized to act on behalf of the data subject is required.

#### **3.1.3 Information for Data Subject Access Request**

Upon receipt of the required documents, the person receiving the request will provide the Data Protection Officer with all relevant information in support of the DSAR. Where the Data Protection Officer is reasonably satisfied with the information presented by the person who received the request, the Data Protection Officer will notify the requestor that his/her DSAR will be responded to within 30 calendar days. The 30 day period begins from the date that the required documents are received. The requestor will be informed by the Data Protection Officer in writing if there will be any deviation from the 30 day timeframe due to other intervening events.



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### **3.1.4 Review of Information**

The Data Protection Officer must ensure that the information is reviewed/received by the imposed deadline to ensure the 30 calendar day timeframe is not breached.

### **3.1.5 Response to Access Requests**

The Data Protection Officer will provide the finalized response together with the information retrieved and/or a statement that the Company does not hold the information requested, or that an exemption applies. The Data Protection Officer will ensure that a written response will be sent back to the requestor. This will be via email, unless the requestor has specified another method by which they wish to receive the response (e.g. post). POLATECHS will only provide information via channels that are secure. When hard copies of information are posted, they will be sealed securely and sent by recorded delivery.

### **3.1.6 Archiving**

After the response has been sent to the requestor, the DSAR will be considered closed and archived by the Data Protection Officer.

## **4.0 POLATECHS responsibility when working as a Data Processor**

### **4.1 Contact**

To make a Subject Access Request or request a change please contact the privacy and data protection manager via the email address [info@polatechs.co.uk](mailto:info@polatechs.co.uk)

### **4.2 Client Policies**

When undertaking work on a client system with a privacy & data protection policy in place, POLATECHS will function under the clients policy and report to the policy manager in relation to data.

### **4.3 POLATECHS Employee Training**

All POLATECHS staff have undertaken certified training for GDPR and data management. Training will be continuously reviewed on an annual basis.

### **4.4 Client Equipment Removal**

When removing client equipment from site privacy and data protection protocol will be followed, ensuring outside of transit that it is kept within a secure POLATECHS company premise.



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#### ***4.5 Storing Client Data***

Client data accessed by POLATECHS on site will be in accordance with the clients privacy & data protection policy. Data will not be duplicated, uploaded externally to client site or removed from site unless confirmation has been given by a nominated client employee for a specified purpose.