

# GDPR Compliance. Eastern Garage, Finchingfield

## Data Protection Policy

<b>Organisation</b>	Eastern Garage Wethersfield Road, Finchingfield, Essex, CM7 4NT <a href="tel:01371810238">01371 810238</a>	
<b>Scope of the policy</b>	<ul style="list-style-type: none"> <li>• This policy applies to Eastern Garage</li> <li>• All staff and volunteers of Eastern Garage</li> <li>• All contractors, suppliers and people working on behalf of Eastern Garage.</li> <li>• The policy applies to all data that Eastern Garage holds relating to identifiable individuals including customer information</li> </ul>	
<b>Policy operational date</b>	See below	
<b>Policy prepared by</b>	Jackie Barker	
<b>Date approved by director</b>		
<b>Review date</b>	Before 25/05/2021	
<b>Purpose of policy</b>	<ul style="list-style-type: none"> <li>• To establish good practice in management of data</li> <li>• To comply with new GDPR Regulations</li> <li>• To protect Eastern Garage customers and staff</li> <li>• To protect Eastern Garage from data breaches</li> </ul>	
<b>Types of data</b>	<p>Personal data for customers:</p> <ul style="list-style-type: none"> <li>• Names and addresses</li> <li>• Telephone numbers</li> <li>• Email addresses</li> <li>• Car registration marks</li> <li>• MOT and Service records</li> <li>• Invoicing data</li> </ul> <p>Personal data for staff:</p> <ul style="list-style-type: none"> <li>• Names and addresses</li> <li>• Telephone numbers</li> <li>• Date of birth</li> <li>• Bank details</li> <li>• Driving License details (scanned copies?)</li> <li>• NI number</li> </ul> <p>(NO SENSITIVE PERSONAL CUSTOMER DATA IS HELD BY EASTERN GARAGE)</p>	<p>Suppliers Data:</p> <ul style="list-style-type: none"> <li>• Phone numbers</li> <li>• Emails</li> <li>• Bank details</li> </ul>
<b>Policy statement</b>	<p>We will ensure that Eastern Garage conform to Data Protection Legislation and provide good services and data solutions which help develop compliance plans. We will ensure that individuals' rights are met and we will be open and honest with individuals whose data we hold. We will train and support all staff who manage personal data.</p> <p>We will notify the Information Commissioner voluntarily if or when necessary.</p>	
<b>Key risks</b>	<p>Eastern Garage is a low data risk Organisation. Current risks are identified as:</p> <ul style="list-style-type: none"> <li>• Security break-in (stolen computers)</li> </ul>	

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|  | <ul style="list-style-type: none"><li>• Human error resulting in inappropriate disclosure of information and/or breach of confidentiality</li><li>• Individuals being harmed through data being breached</li></ul> |
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## Responsibilities

Everyone who works for eastern garage has some responsibility for ensuring data is collected, handled and stored appropriately. However, these people have key areas of responsibility:

- **Director:**
  - Eastern Garage Director will hold ultimate responsibility for ensuring legal obligations are being met.
- **Garage Manager:**
  - Ensuring the Director is updated regarding Data Protection changes
  - Reviewing procedures and related policies in a timely fashion
  - Handling data protection questions from staff and customers
  - Dealing with requests from individuals to be amended in the systems
  - Ensure staff have a good working knowledge of new data protection policies and procedures
- **Administrative support team:**
  - Ensure that data is entered, securely stored and does not exceed the types of data listed on page 2 of this policy
  - To make the Manager aware of any data or confidentiality breach
- **General staff Guidelines**
  - Only staff members who need the **specific information for their work** should be accessing the data
  - **Data must not be shared informally.** Personal data should be requested from the line manager.
  - Eastern Garage will provide support for all staff to help them understand their responsibilities regarding the handling of data.
  - **Strong individual passwords must be used** at all times and they must never be shared
  - Data should be **regularly reviewed and updated** if it is found to be out of date.

## Lawful Processing and data management

An assessment of the data held indicates that all data gathered and retained by Eastern Garage has a Lawful basis under the "*Legitimate Interest*" for the processing of data under Article 6(1)(f) of the General Data Protection Regulations (GDPR) 2018.

All data held by Eastern Garage will be used solely for the purpose of ensuring vehicular requirements, has a minimal privacy impact on people's rights, and is data the customer would "reasonably expect" to be

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processed for this purpose. Eastern Garage is jointly the Data Controller and the Data Processor of all said data and must use this only for business continuity.

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## Data Storage

These rules explain how and where data should be safely stored. Questions regarding personal data should be directed to the Eastern Garage manager.

### ***Paper-based data storage:***

- Should be kept in a secure place where unauthorised people cannot access it.
- Papers should be in a **locked drawer or filing cabinet**.
- Employees must ensure that paper records and printouts are **not left where they can be seen by unauthorised people**.
- Unused paper data sheets should be shredded after 7 years

### ***Electronic data storage:***

- Data must be protected by the use of **strong individual passwords**
- All portable data storage devices e.g. memory sticks, pen drives, must be locked away securely when not in use.
- Data should only be stored on designated computers and within designated drives.
- Customer and staff data should be backed up frequently (data should never be saved directly to a laptop).
- All computers must have appropriate **approved** security software and firewall protection.
- Electronic data will be securely held for as long as the customer continues to utilise Eastern Garage services. Data of customers no longer using the service will be archived, coded and backed-up.

### ***Data use:***

The data held by Eastern Garage must be of use for the work carried out within the Company. The greatest risk of data breach is unauthorised access resulting in loss, corruption or theft of the data.

- When employees leave their computers **screens must be locked**
- Personal data must not be shared informally (particularly by email as this is not secure).
- Personal data should never be supplied to third parties (with the exception of suppliers and specialist contractors)

### ***Data accuracy:***

The law requires Eastern Garage to take reasonable steps to maintain data accuracy. It is the responsibility of all employees to **maintain accuracy** when entering data.

- Data should be held in as few places as possible
- Staff should update data regularly and immediately if an inaccuracy is identified e.g. if a customer cannot be reached on their telephone number it should be removed from the system.
- Every opportunity to update the accuracy of data should be utilised e.g. confirming a customer's telephone number or address when they call.

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## Subject access requests

All individuals whose data is held by Eastern Garage are entitled to:

- Ask **what information** the Company holds about them and why.
- Ask how to **gain access to it**
- Be informed **how to keep it up to date**
- Be informed how the Company is **meeting its data protection obligations**

If an individual contacts the Company requesting this information, it is known as a “**subject access request**”.

These requests from individuals should be made by email, addressed to [info@easterngarage.net](mailto:info@easterngarage.net) . The data controller can supply a standard request form (DP2), although individuals do not have to use this.

The data controller will always verify the identity of anyone making a subject access request before any information is handed over.

Individuals will be charged £10 per subject access request and the data controller should aim to provide the relevant data within 14 days

## Disclosure of data for other reasons

In certain circumstances, the DATA Protection Act (2018) allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, Eastern Garage will disclose the requested data. However, the data processor must ensure the request is legitimate and will seek advice from the Director and/or a legal advisor.

## Providing information

Eastern Garage aims to ensure that all individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights.

Eastern Garage has an updated privacy statement setting out how data is being used by the Company. This is located in the Eastern Garage waiting area and is also available on the website.