

# General Data Protection Regulation of Star Vision Photography Ltd 2020

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## **I. Context and overview key details**

- Policy prepared by: Andrew Robinson
- Next review date: 30<sup>th</sup> April 2021
- Company Name: Star Vision Photography Ltd
- Company Address: Star Vision Photography, 172 Nuncargate Road, Kirkby-in-Ashfield, Nottingham NG17 9EA

## **II. Introduction**

Star Vision Photography needs to gather and use certain information about individuals in the course of conducting their business.

These can include customers, suppliers, business contacts, employees and other people the business has a relationship with or may need to contact. This also includes names, admission numbers and sometimes dates of birth for staff, students and school children particularly to produce ID cards, data matched images on CD for use in schools IT systems and named group photographs.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

## **III. Why this policy exists**

This General Data Protection Regulation 2018 Policy ensures that Star Vision Photography School Photography:

- Follows good practice and complies with the data protection law
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

## **IV. General Data Protection Regulation 2018**

The General Data Protection Regulation 2018 describes how organisations — including Star Vision Photography — must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The General Data Protection Regulation 2018 is underpinned by six important principles. These say that personal data must be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## **V. Data protection risks**

This policy helps to protect Star Vision Photography School Photography from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

## **VI. People, risks and responsibilities policy scope**

This policy applies to:

- The head office of Star Vision Photography

- All branches of Star Vision Photography
- All staff and volunteers of Star Vision Photography
- All contractors, suppliers and others working on behalf of Star Vision Photography

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the General Data Protection Regulation 2018. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Photographs
- plus any other information relating to individuals

## **VII. Responsibilities**

Everyone who works for or with Star Vision Photography has some responsibility for ensuring data is collected, stored and handled appropriately. All employees have received GDPR training.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and General Data Protection Regulation 2018 principles.

The Directors have overall responsibility

## **VIII. Staff guidelines**

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- Star Vision Photography will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

## **IX. Providing Information**

Star Vision Photography aims to ensure that individuals are aware that their data is being processed, and that they understand:

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

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

## **Disclosing data for other reasons**

In certain circumstances, the General Data Protection Regulation 2018 allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Star Vision Photography will disclose the requested data. However, the Data Controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

## **XI. Security**

We constantly review the encryption methods and levels of our digital files that are required to be transferred. We use security software to test our network for vulnerabilities. Data is stored on our cloud based storage system which is one of the most advanced and secure. It is the same model that is used by the Ministry of Defence.

All individuals who are the subject of personal data held by Star Vision Photography 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.
- How Star Vision Photography remove the personal data

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to [team@starvisionphotography.co.uk](mailto:team@starvisionphotography.co.uk). The Data Controller can supply a standard request form, although individuals do not have to use this.

The Data Controller will aim to provide the relevant data within 28 days.

The Data Controller will always verify the identity of anyone making a subject access request before handing over any information.

## **XII. Payments**

Any visa, credit card and cheque payments that are handed in to the school are collected by one of our employees and taken directly to our secure head office. They are stored in our electronically secured safe until processed in a secure office which only authorised employees have access to.

## **XIII. Online Ordering**

Star Vision Photography are unique in the way they produce online orders. Every image is stored on our cloud based server. Only when the username and password is entered does the proof image become available to view. Images are never uploaded until the parent's request to place an online order.

Card payments are provided by Stripe who deal with the complete process of handling the card payments. This means that we do not process payment information and do not store it ourselves. The payment is transacted through Secure Server Software, which encrypts all the information so that it can't be intercepted.

Orders that are sent to home addresses are not sent with any identifiable data other than name and address of the person who placed the order and our company details.

## **XIV. Data Retention**

Star Vision Photography collects and uses personal data to administer orders and deliver photographs. We also use it to anticipate and resolve queries.

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the Directors. We do not disclose this data to any third parties.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files are kept in a locked drawer or filing cabinet.
- Employees make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- Data printouts are destroyed and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data is protected by strong passwords that are changed regularly and never shared between employees.

- If data is stored on removable media (like a CD or DVD), these are kept locked away securely when not being used. CD and DVD images are securely disposed of by use of a Data Destruction Company.
- Data is only stored on password protected designated drives and servers.
- Data is backed up frequently. Those backups are tested regularly, in line with the company's standard backup procedures.
- Data is only saved directly to laptops with strong password protection and never to other mobile devices like tablets or smart phones.
- All servers and computers containing data are protected by approved security software and a firewall.

Personal data is of no value to Star Vision Photography unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees ensure the screens of their computers are always locked when left unattended.
- Personal data is not shared informally.
- Data must be encrypted before being transferred electronically. The IT Director can explain how to send data to authorised external contacts.
- Personal data should never be transferred outside of the European Economic Area.
- Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

The law requires Star Vision Photography to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Star Vision Photography School Photography should put into ensuring its accuracy.

## **XV. Photographers**

All of our photographers are DBS checked and carry an up to date certificate. They may also carry QR tickets, when necessary which contain student's personal information. The QR tickets are printed by security cleared personnel only and are provided directly to the photographer. After the shoot the tickets are disposed of in the correct manner.

## **XVI. Office and Laboratory**

Only authorised employees have access to personal data. Files are kept in locked filing cabinets. Computers are password protected. Any printouts are securely destroyed when no longer required.

We have roller shutter doors fitted to our offices, where all of the images are produced internally and then packed by our own internal packing department within the same building. We have alarm control system to the premises.