

Imagination – Data Protection Policy

Context and Overview

Key Details

Policy prepared by; Susan Johnson
ICO Registration Reference: ZA329584
Next Review Date: 18th March 2019

Introduction

Imagination needs to gather and use certain information about individuals.

This will include customers, suppliers, business contacts, employees and other people the company has a relationship with. This also includes names and occasionally dates of birth of students/school children. These are for the production of data matched images on a CD for use in the schools on the school's in house SIMS or other operating software; they may also be used on occasion for names class group photographs.

This policy describes how this personal data will be collected, handled and stored to comply with the Data Protection Act 2018.

Why this policy exists

The General Data Protection Regulation 2018 ensures that Imagination:

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

General Data Protection Regulation 2018

The General Data Protection Regulation 2018 describes how organisations including Imagination must collect, handle and store personal information.

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

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. We are registered with the Information Commissioners Office our registration number is ZA329584.

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 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 purposed, further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, shall not be considered to 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 or 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 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.

People, Risks and Responsibilities

Policy Scope

This policy applies to:

The head office of IMAGINATION

All staff of IMAGINATION

All contractors, suppliers and others working on behalf of IMAGINATION

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

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Plus any other information deemed as personal relating to individuals

Data Protection Risks

This policy helps to protect Imagination and our customers from some very real data protection risks including:

Breaches of confidentiality. For instance, information being given out inappropriately.

Failing to offer choice. All individuals should be free to choose how the company uses data relating to them.

Reputational damage. The company and individuals could suffer if hackers successfully gained access to sensitive data.

Responsibilities

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

Each staff member that handles personal data must ensure it is handled and processed in line with this policy and GDPR 2018 principles.

Susan Johnson of IMAGINATION is ultimately responsible for ensuring that all legal obligations are met and regular checks are carried out within the office to ensure:

- Data protection is continually risk assessed and monitored
- All systems, services and equipment used for storing data meet acceptable security standards
- Data breach is recorded, and if required, reported to the I.C.O in a timely manner

Data Storage

IMAGINATION collects and uses personal data to administer orders and deliver photos.

These rules describe how and where data should be safely stored.

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

IMAGINATION HAS AN ALARMED SECURED BUILDING WITH CONTROLLED ACCESS TO
IMAGINATION STAFF ONLY

ALL PAPERWORK WITHIN THE BUILDING IS ALSO LOCKED IN SECURE FILING CABINETS

PERSONAL DATA PRINTOUTS ARE CROSS SHREDDED AND SECURELY DISPOSED OF WHEN
NO LONGER REQUIRED

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

IMAGINATION HAS STRONG PASSWORD PROTECTION WHICH IS NEVER SHARED WITH OUTSIDE SOURCES, PASSWORDS ARE ALSO CHANGED REGULARLY

DATA IS STORED FOR A MAXIMUM OF 3 MONTHS BEFORE DELETION

PUPIL INFORMATION FROM SCHOOLS FOR SIMS.NET IMAGE MATCHING IS ENCRYPTED IN A ZIP FILE BEFORE BEING TRANSFERRED FOR USE ON THE DAY ONLY TO THE PHOTOGRAPHERS LAP TOP. THIS INFORMATION WILL ONLY BE USED BY THE PHOTOGRAPHERS ON THE DAY

Data Accuracy

The law required IMAGINATION to take reasonable steps to ensure data is kept accurate and up to date.

The more important is that the personal data is accurate, the greater the effort IMAGINATION should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary.
- Every opportunity will be taken to ensure data is correct, up to date and erased in a timely manner.

Photographers

IMAGINATION photographers are DBS checked and carry a copy of their certificate at all times.

Payments

Any card details, check and cash payments that are handed into the school are collected by an IMAGINATION employee and taken directly to the secure alarmed head office. All card slips are processed on the same day as collected and immediately cross shredded and disposed of securely after processing via card pay. Schools keep incoming payment slips in the school safe for collection.

Subject Access Requests

All individuals who are the subject of personal data held by IMAGINATION 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.
- Have a right to deletion or correction of inaccuracies.

IMAGINATION will always verify the identity of anyone making a subject access request by handing over any information and will aim to provide the relevant data within 28 days. Requests must be in writing (including e-mail) and will be responded to within 30 calendar days without cost to the applicant.

Should you require any further assistance please contact Susan Johnson at imagination.london@hotmail.co.uk

Appendix 1

Details of Processes: SIMS MS Schools

- School supplies Susan Johnson at IMAGINATION with a Pupil Admission via secure email
- Susan Johnson at IMAGINATION downloads this onto an encrypted laptop
- Susan Johnson at IMAGINATION attends school and takes photographs which are loaded onto an encrypted laptop
- Susan Johnson at IMAGINATION develops proofs, SIMS image matching generates a unique serial number for each photograph, not related to Pupil Admission Number.
- Data is transferred from encrypted laptop to work station via a wired connection.
- Photographs are hand delivered to the school and CD of photographs are hand delivered for the school to add to SIMS
- Susan Johnson at IMAGINATION deletes all laptop files from work station after 3 month period (in case of late orders) and furthermore deletes the recycling bin on her laptop.

A handwritten signature in black ink, appearing to read 'S. Johnson', written in a cursive style.

Susan Johnson
Imagination Photography