The Printed Word

...More than just ink on paper

Data Privacy and GDPR Policy

Version 1.0

Contents

Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Policy Pros	March 2024	March 2025	First Policy.

Introduction and Purpose

This policy sets out how The Printed Word complies with our data protection obligations and seeks to protect personal and company information relating to our staff, customers and suppliers.

Its purpose is also to ensure that staff understand and comply with the rules governing the collection, use and deletion of personal and company information to which they may have access in the course of their work.

We are committed to complying with our data protection obligations and to being concise, clear, and transparent about how we obtain and use personal and company information relating to our staff and customers and how (and when) we delete that information once it is no longer required.

Rob Pryer, Managing Director, is our Data Protection Officer (DPO) and is responsible for providing training, guidance, and support to staff on our data protection obligations and monitoring compliance with those obligations.

If you have any questions or comments about the content of this policy or if you need further information, you should contact our Data Protection Officer by emailing rob.pryer@printedword.co.uk.

Our ICO reference number is ZB575052.

Scope

This policy applies to all staff (full-time, part-time or casual), self-employed contractors subcontractors of The Printed Word, who will be referred to as 'staff' or 'staff members'.

This policy and any related documents may be distributed to staff, customers, suppliers, governing and compliance bodies and any other relevant third parties.

In some cases, third parties, such as those performing work for or on behalf of The Printed Word, will be expected to adhere to our policy, which will be made available where applicable.

We will circulate any new or modified policy to staff and any other stakeholders when it is adopted.

Definitions

Data Breach
Means a breach of security leading to the accidental or unlawful destruction, loss, alteration, or unauthorised disclosure of, or access to, personal information.

Data Subject
Means the individual to whom the personal information relates.

Personal Information
Sometimes known as personal data means information relating to an individual who can be identified (directly or indirectly) from that information.

Processing Information
Means obtaining, recording, organising, storing, amending, retrieving, disclosing and/or destroying information, or using or doing anything with it.

Pseudonymised
This means the process by which personal information is processed in such a way that it cannot be used to identify an individual without the use of additional information, which is kept separately and subject to technical and organisational measures to ensure that the personal information cannot be attributed to an identifiable individual.

Sensitive Personal Information
Sometimes known as 'special categories of personal data' or 'sensitive personal data', means personal information about an individual's race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-membership), genetics information, biometric information (where used to identify an individual) and information concerning an individual's health, sex life or sexual orientation.

Processor
The UK GDPR defines a processor as a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Controller
"Controller" means the natural or legal person, public authority, agency, or any 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 processing are determined by the EU or Member State laws, the controller may be designated by those laws. Art.2(d) GDPR.

Data Protection Principles

The Printed Word will comply with the following data protection principles when processing personal information:

- We will process personal information lawfully, fairly and in a transparent manner;
- We will collect personal information for specified, explicit and legitimate purposes only and will not process it in a way that is incompatible with those legitimate purposes;
- We will only process the personal information that is adequate, relevant, and necessary for the relevant purposes;
- We will keep accurate and up-to-date personal information and take reasonable steps to ensure that inaccurate personal information is deleted or corrected without delay;
- We will keep personal information for no longer than is necessary and for the purposes for which the information was collected for processing; and
- We will take appropriate technical and organisational measures to ensure that personal information is kept secure and protected against unauthorised or unlawful processing and accidental loss, destruction, or damage.

The Basis for Processing Personal Information

Concerning any processing activity, we will, before the processing starts for the first time, and then regularly while it continues:

- Review the purposes of the processing activity and select the most appropriate lawful basis (or bases) for that processing, for example:
    - That the data subject has consented to the processing;
    - That the processing is necessary for the performance of a contract to which the data subject is a party;
    - To take steps at the request of the data subject before entering into a contract;
    - That the processing is necessary for compliance with a legal obligation to which The Printed Word is subject;

- That the processing is necessary for the protection of the vital interests of the data subject or another natural person;
- That the processing is necessary for the performance of a task carried out in the public interest or exercise of official authority; or
- That the processing is necessary for legitimate interests of The Printed Word or a third party, except where those interests are overridden by the interests of fundamental rights and freedoms of the Data Subject.

Note: Except where the processing is based on consent, The Printed Word will satisfy itself that the processing is necessary for the relevant lawful basis (for example, that there is no other reasonable way to achieve that purpose).

- Document our decision as to which lawful basis applies to help demonstrate our compliance with the data protection principles.
- Include information about both the purposes of the processing and the lawful basis for it in our relevant privacy notice(s).
- Where sensitive personal information is processed, also identify a lawful special condition for processing that information and document it; and
- Where criminal offence information is processed, also identify a lawful condition for processing that information and document it.
- Determine whether The Printed Word's legitimate interests are the most appropriate basis for lawful processing, and if so, we will:
  - Conduct a Legitimate Interest Assessment (LIA) and keep a record of it to ensure that we can justify our decision;
  - If the LIA identifies a significant privacy impact, consider whether we also need to conduct a data protection impact assessment (DPIA);
  - Keep the LIA under review and repeat it if circumstances change; and
  - Include information about our legitimate interests in our relevant privacy notice(s).

Sensitive Personal Information

The Printed Word may need to process sensitive personal information. We will only process sensitive personal information if:

- We have a lawful basis for doing so set out above; for example, it is necessary for the performance of the employment contract to comply with The Printed Word's legal obligations for individuals or The Printed Word's legitimate interests; and
- One of the special conditions for processing sensitive personal information applies, for example:
    - The data subject has given explicit consent so that The Printed Word can provide its services.
    - The processing is necessary for exercising the employment law rights or obligations of The Printed Word or the data subject.
    - The processing is necessary to protect the data subject's vital interests, and the data subject is physically incapable of giving consent.
    - The processing relates to personal data, which are manifestly made public by the data subject.
    - The processing is necessary for the establishment, exercise, or defence of legal claims; or
    - The processing is necessary for reasons of substantial public interest.

Before processing any sensitive personal information, staff must inform the DPO of the proposed processing so that they may assess whether the processing complies with the criteria noted above.

Sensitive personal information will not be processed until:

- The assessment has been completed; and
- The individual has been properly informed (by way of a privacy notice or otherwise) of the nature of the processing, the purposes for which it is being carried out and the legal basis for it.

The Printed Word will not carry out automated decision-making (including profiling) based on an individual's sensitive personal information.

Concerning sensitive personal information, The Printed Word will comply with the procedures set out to make sure that it complies with the data protection principles set out above.

During the recruitment process, we will ensure that (except where the law permits otherwise):

- During the shortlisting, interview and decision-making stages, no questions are asked relating to sensitive personal information, for example, race or ethnic origin, trade union membership or sexual orientation;
- If sensitive personal information is received, for example, the applicant provides it without being asked for it within their CV or during the interview, no record is kept of it, and any reference to it is immediately deleted or redacted;
- 'Right to work' checks are carried out before an offer of employment is made unconditionally and not during the earlier shortlisting, interview, or decision-making stages;
- During employment, we will process:
    - Health information to consider fitness to work, keep sickness absence records, and facilitate employment-related health and sickness benefits;
    - Sensitive personal information for equal opportunities monitoring and pay equality reporting. Where possible, this information will be anonymised.

Criminal Records Information - Staff

Criminal records information will be processed by a third party on The Printed Word's behalf. Staff are required to inform the business of any new criminal convictions where they relate to the role.

Data Protection Impact Assessments (DPIAs)

Where data processing is likely to result in a high risk to an individual's data protection rights, either for internal The Printed Word business operations or the execution of a contract, we will, before commencing the processing, carry out a DPIA to assess:

- Whether the processing is necessary and proportionate concerning its purpose.
- The risks to individuals.

- What measures can be put in place to address those risks and protect personal information.

Before any new form of technology is introduced, a DPIA will be carried out.

During any DPIA, the Data Protection Officer will seek appropriate advice from data protection experts and/or the relevant governing bodies/authorities (for example, the ICO).

Documentation and Records

We will keep records of processing activities, including:

- The purposes of the processing;
- A description of the categories of individuals and categories of personal data;
- Categories of recipients of personal data;
- Where relevant, details of transfers to third countries, including documentation of the transfer mechanism safeguards in place;
- Where possible, retention schedules; and
- Where possible, a description of technical and organisational security measures.

As part of our record of processing activities, we document, or link to documentation, on:

- Information required for privacy notices.
- Records of consent.
- Controller-processor contracts.
- The location of personal information.
- DPIAs; and
- Records of data breaches.

If we process sensitive personal information or criminal records information, we will keep written records of:

- The relevant purpose(s) for which the processing takes place, including (where required) why it is necessary for that purpose;
- The lawful basis for our processing; and
- Whether we retain and erase the personal information following our policy document and, if not, the reasons for not following our policy.

We will conduct regular reviews of the personal information we process and update our documentation accordingly. This may include:

- Carrying out information audits to find out what personal information The Printed Word holds.
- Distributing questionnaires and talking to staff across The Printed Word to get a more complete picture of our processing activities; and
- Reviewing our policies, procedures, contracts, and agreements to address areas such as retention, security, and data sharing.

We document our processing activities in electronic form so we can add, remove, and amend information easily.

General Controls in Place

There is a process of continual review to determine whether any changes in the organisation's registration are required as a result of changes in the nature of the business.

- The details of The Printed Word are registered and kept up to date.
- The notification to the Information Commissioner's Office is renewed annually.
- The Printed Word maintains and updates the public data protection register, which will be reviewed regularly and at least on an annual basis.

Privacy Notices

The Printed Word will issue privacy notices from time to time, informing individuals about the personal information that we collect and hold relating to them, how they can expect their personal information to be used and for what purposes.

We will take appropriate measures to provide information in privacy notices in a concise, transparent, intelligible, and easily accessible form, using clear and plain language.

Individual Rights

Individuals have the following rights concerning their personal information:

- the right to access personal data held about them (the right of subject access);
- the right to be informed about how and why their data is used - and you must give them privacy information;
- the rights to have their data rectified, erased or restricted;
- the right to object;
- the right to portability of their data; and
- the right not to be subject to a decision based solely on automated processing.

Note: There are exemptions and restrictions that can, in some circumstances, be legitimately applied to exempt or qualify the right of individuals to exercise their rights. For example:

- If complying with an individual's request would jeopardise national security, defence, or public safety.
- If fulfilling the request would undermine the prevention, investigation, detection, or prosecution of criminal offences.
- In the interest of protecting public health, particularly in situations like controlling diseases or other health threats.
- If the processing of personal data is necessary for the establishment, exercise, or defence of legal claims.
- If fulfilling them would infringe upon the rights and freedoms of others, including trade secrets or intellectual property.

Individual Staff Obligations

Updating Personal Information

Individual staff members are responsible for helping The Printed Word keep their personal information up to date.

You must let the business know if the information you have provided to us changes, for example, if you move to a new house or change your bank account.

Accessing Other's Data

You may have access to the personal information of other members of staff, customers and suppliers of The Printed Word in the course of your employment or engagement.

Therefore, The Printed Word expects you to help meet its data protection obligations to those individuals. For example, you should be aware that they may also enjoy the rights set out above.

If you have access to personal information, you must:

- Only access the personal information that you have authority to access, and only for authorised purposes.
- Only allow other staff to access personal information if they have appropriate authorisation.
- Only allow individuals who are not The Printed Word staff to access personal information if you have specific authority from the Data Protection Officer to do so.
- Keep personal information secure, for example, by complying with rules on computer access, password protection, secure file storage and destruction, etc.
- Not store personal information on personal devices.

You should contact the Data Protection Officer if you are concerned or suspect that one of the following has taken place (or is taking place or is likely to take place):

- Processing of personal data without a lawful basis for its processing or, in the case of sensitive personal information, without one of the conditions being met;
- Any data breach as set out below;

- Access to personal information without the proper authorisation;
- Personal information not kept or deleted securely;
- Removal of personal information, or devices containing personal information (or which can be used to access it), from The Printed Word's premises without appropriate security measures being in place;

- Any other breach of this policy or any of the data protection principles set out above.

Information Security

The Printed Word will use appropriate technical and organisational measures to keep personal information secure and to protect against unauthorised or unlawful processing and accidental loss, destruction, or damage. These may include:

- Ensuring that, where possible, personal information is pseudonymised or encrypted;
- Ensuring the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- Ensuring that in the event of a physical or technical incident, availability and access to personal information can be restored promptly; and
- A process for regularly testing, assessing, and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

In rare cases where The Printed Word uses external organisations to process personal information on its behalf, additional security arrangements need to be implemented in contracts with those organisations to safeguard the security of personal information. In particular, contracts with external organisations must provide that:

- The organisation may act only on the written instructions of The Printed Word;
- Those processing the data are subject to a duty of confidence;
- Appropriate measures are taken to ensure the security of processing;
- Sub-contractors are only engaged with the prior consent of The Printed Word and under a written contract;

- The organisation will assist The Printed Word in providing subject access and allowing individuals to exercise their rights under the GDPR;
- The organisation will assist The Printed Word in meeting its GDPR obligations concerning the security of processing, the notification of data breaches and data protection impact assessments;
- The organisation will delete or return all personal information to The Printed Word as requested at the end of the contract; and
- The organisation will submit to audits and inspections, provide The Printed Word with whatever information it needs to ensure that they are both meeting their data protection obligations and tell The Printed Word immediately if it is asked to do something infringing on data protection law.

Before any new agreement involving the processing of personal information by an external organisation is entered into or an existing agreement is altered, the relevant staff must seek approval of its terms by the Data Protection Officer.

Storage and Retention of Personal Information

Personal information (and sensitive personal information) will be kept securely following The Printed Word's principles below:

- Personal information (and sensitive personal information) should not be retained any longer than necessary. The length of time over which data should be retained will depend upon the circumstances, including the reasons why the personal information was obtained. Staff should follow The Printed Word's retention periods, which set out the relevant period or the criteria that should be used to determine the retention period. Where there is any uncertainty, staff should consult the Data Protection Officer by emailing rob.pryer@printedword.co.uk.
- Personal information (and sensitive personal information) that is no longer required will be deleted permanently from our information systems, and any hard copies will be destroyed securely.

Data Breaches

A data breach may take many different forms, for example:

- Loss or theft of data or equipment on which personal information is stored;
- Unauthorised access to or use of personal information either by a member of staff or a third party;
- Loss of data resulting from an equipment or systems (including hardware and software) failure;
- Human error, such as accidental deletion or alteration of data;
- Unforeseen circumstances, such as a fire or flood;
- Deliberate attacks on IT systems, such as hacking, viruses or phishing scams; and
- 'Blagging' offences, where information is obtained by deceiving the organisation which holds it.

In the event of a Data Breach, The Printed Word will:

- Immediately take such steps as are necessary to minimise the risk to customers, staff, and the organisation.
- Risk assesses the situation and determine what steps need to be taken.
- Make the required report of a data breach to the Information Commissioner's Office without undue delay and, where possible, within 72 hours of becoming aware of it if it is likely to result in a risk to the rights and freedoms of individuals;
- Notify the affected individuals if a data breach is likely to result in a high risk to their rights and freedoms, and notification is required by law.
- Take such steps as are necessary to ensure that similar breaches cannot happen again.

International Transfer of Data

The Printed Word does not transfer personal information outside the European Economic Area (EEA) (which comprises the countries in the European Union and Iceland, Liechtenstein and Norway) to other countries. If this were to be required, it would be on the basis that that country, territory or organisation is designated as having an adequate level of protection OR that the organisation receiving the information has provided adequate safeguards by way of standard data protection clauses.

Staff Training

All staff will be required to read this policy and attend training on the subject matter. This training will vary but will be completed on induction and refreshed every 2 years.

Data Processing and Retention

Digital Data Storage

The following core systems are used to store day-to-day operational information. Access is only provisioned to individuals with a legitimate need.

The systems typically used are:

- Accura (our CRM, which is hosted on our server)
- Cloud-based server backups

Note: Our IT provider has access to these systems. However, they will abide by this policy.

Physical Data Storage

Staff data is stored in hard copy personnel files, which are stored in locked filing cabinets in a locked office on the premises.

Sharing of Data

Staff, customer and supplier data is only shared with the following individuals and organisations:

- HMRC (in respect of statutory payments of tax, NI, family or sick leave pay, etc. to staff)
- The People's Pension (our staff pension provider).
- Emergency services, welfare organisations, etc. (as required and there is a lawful basis).

Customer and Supplier Data Stored

This table details the specific data types stored, the reason the data is processed, along with the legal/legitimate reason, and the expected retention period.

Information Type
Customer and Supplier Data
Data Stored
Note: some customers and suppliers provide their personal details if they are not ordering or working on behalf of a larger organisation. • Name • Signature • Address (business and/or personal) • Telephone (business and/or personal) • Email (business and/or personal) • Financial and Transactional Data • CCTV images (if attending the premises)
Processing Reason
• Administration and Management of The Printed Word services.
Legal Interest/Legitimate Reason
• Performance of contract. • The consent of the individual. • Legitimate interests.

Retention Policy
7 years after termination of services.

Staff Data Stored

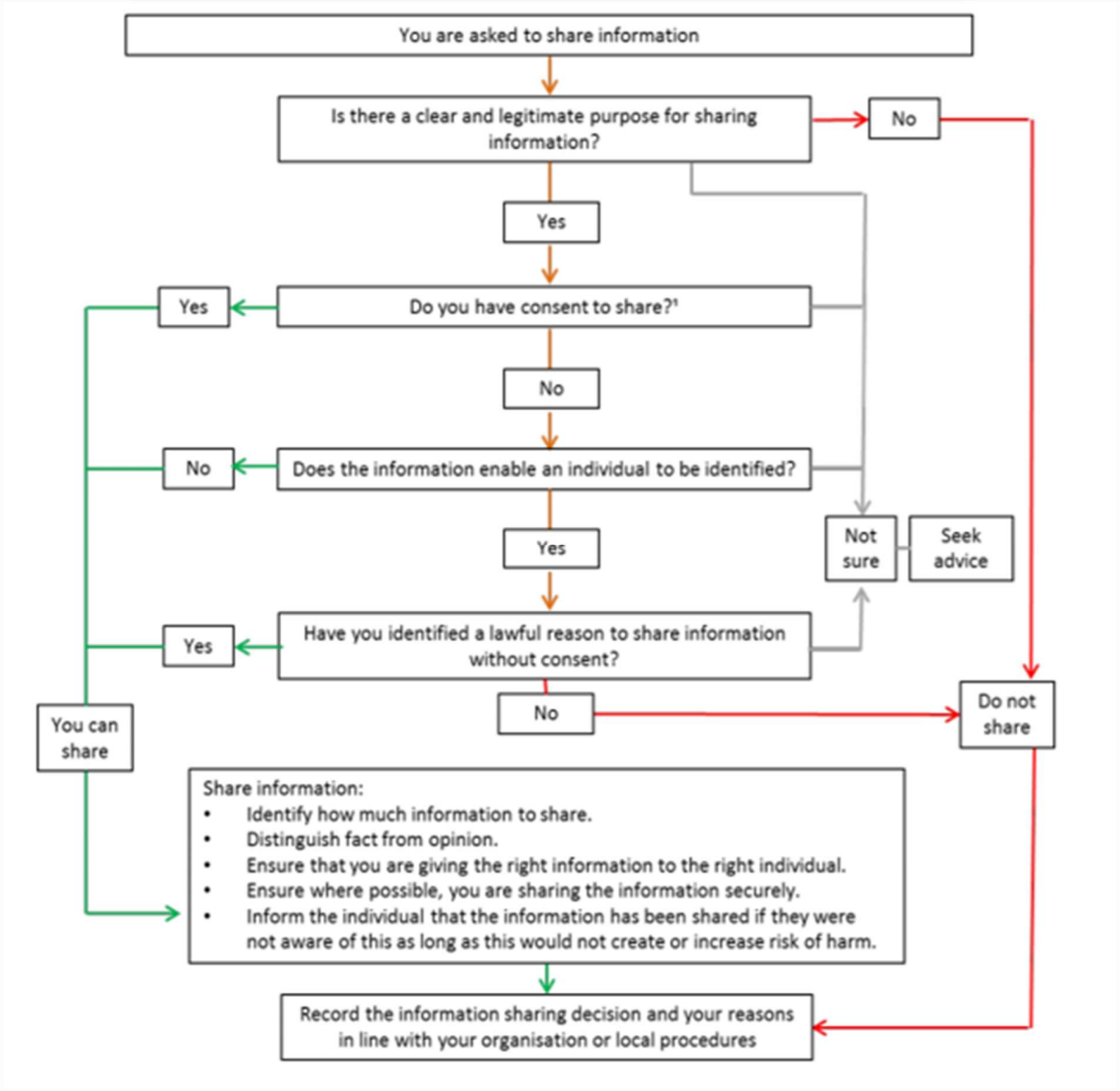
This table details the specific data types stored, the reason the data is processed, along with the legal/legitimate reason, and the expected retention period.

Information Type
Staff Data
Data Stored
• Name • Address • Telephone • Email • Sex • National Insurance Number • Bank or Building Society details • Work history • Evidence of right to work in the UK/immigration status • Criminal Records (as required) • Health data (for example, relating to sickness absence, reasonable adjustments due to a disability, etc.) • Emergency Contact Details • Copy of driving licence (as required) • CCTV images

Processing Reason
• Provision of employment obligations. • Fulfilment of contract.
Legal Interest/Legitimate Reason
• Performance of contract. • The consent of the individual. • Legal obligation. • Legitimate interests.
Retention Policy
6 years after the end of employment.

Data Sharing Process Flow

The diagram below represents a typical process flow for UK GDPR data sharing, the controls around data sharing and the actions that should be taken before sharing data.



Subject Access Requests and Data Rights – Team Members and Clients

Introduction

Under GDPR legislation, Data Controllers shall provide the information outlined in Articles 13 & 14 to Data Subjects and Data Subjects may access, correct, delete, restrict processing of, and transfer their personal data, as well as object to automated decision-making based on their personal data.

SAR and Data Rights Procedure

Subject Access Requests (SAR) should come to the DPO email address in the first instance and be followed up with an acknowledgement letter/email.

All requests and their progress must be logged by the Data Protection Officer in a secure place with no external access.

SAR Timescales

All Subject Access Requests will be completed within 30 days unless defined as complex.

If the time will exceed 30 days, the requestor will be notified by return email to their request submitted to the DPO address.

SAR Fee's

Subject Access Requests coming directly from the data subject will be free. However, The Printed Word can charge a fee if requests become unfounded or excessive.

If requests are coming from another individual on behalf of a data subject, The Printed Word may charge a fee for data retrieval.

Consequences of Failing to Comply

The Printed Word takes compliance with this policy very seriously. Failure to comply with the policy:

- Puts at risk the individuals whose personal information is being processed; and
- Carries the risk of significant civil and criminal sanctions for the individual and The Printed Word; and
- May, in some circumstances, amount to a criminal offence by the individual.

Because of the importance of this policy, a staff member's failure to comply may lead to disciplinary action, which may result in dismissal for gross misconduct.

If a non-employee breaches this policy, their contract may be terminated with immediate effect.

If you have any questions or concerns about anything in this policy, do not hesitate to contact the Data Protection Officer.

Monitoring and Reviewing

The Printed Word is committed to ensuring our policies are effective and up-to-date. To do this, we have a process for regularly monitoring and reviewing them.

The Senior Management Team is responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws or our practices.