



CK-Tech Ltd

GDPR DATA Policy

Reference A: CK-Tech Ltd May 2019 - Privacy Policy

General:

Protection Policy and Instruction

1. The EU General Data Protection Regulation or "GDPR" is the most important change to data protection and privacy law in two decades. It was approved by the EU Parliament in April 2016 and came into force in the UK on 25th May 2018. The GDPR has replaced the Data Protection Act 1998 and, while it is like the current regime under the 1998 Act in many ways, it is a great deal more modern, considering major advances in science and technology. CK-Tech Ltd have issued this policy as a 'live document' to be used as tool by CK-Tech Ltd, in conjunction with Reference A, the 'holder' and its appointed representatives to guide and comply with GDPR in the interests of its employees and the Company.

The Data Protection Principles:

2. Under the GDPR, the data protection principles set out the main responsibilities for organisations. The principles are like those in the DPA, with added detail at certain points and a new accountability requirement. The GDPR does not have principles relating to individuals' rights or overseas transfers of personal data - these are specifically addressed in separate articles: see GDPR Chapter III and Chapter V respectively.

3. The GDPR requires CK-Tech Ltd to show how it complies with the principles -for example by documenting the decisions you take about a processing activity

4. GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- 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;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 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;

- 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;
- 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.

Compliant, Lawful, Fair, Transparent Data Processing:

5. CK-Tech Ltd in line with regulations in which companies process personal data of their clients have been tightened under GDPR. Consent is at the heart of the new regulation and it is something that CK-Tech Ltd pays focus to in their GDPR controls.

6. CK-Tech Ltd has broken the principle down in to three questions in order to guide and better manage and control data;

- whose personal data are we collecting
- why are we collecting it
- how we are approaching the subsequent processing of the data

7. The reason for the collection and processing of personal data has be clearly determined and documented upon a legal basis and in requirements to support employment within the CK-Tech Ltd Privacy Notice; with a copy given to each employee. The approach to the processing of the data is centred around consent. CK-Tech Ltd are to ensure the following conditions must be adhered to for consent to be deemed valid:

- Consent must be given from an employee's own free will, without force and there must be no requirement for unnecessary details.
- The person/data subject must be clearly informed, in plain language, what exactly is being asked of them and how they can opt-in or out.
- In relation to the above conditions, the consent given will be specific only to the processing at the stated time of consent and cannot be used or changed later without further consent.
- Positive action must be used to indicate consent i.e. the person must submit a form or tick a box to give indication of their consent.
- Should an organisation meet these conditions already, existing consent from clients shall be deemed valid. In the case of persons under the age of 16, processing of their personal data is only lawful if parental consent is also given in addition to compliance with the above terms.
- Regarding our data processing, we must also ensure data subjects are also informed and aware of the following:
 - o the identity and the contact details of the controller or its representative
 - o the contact details of the data protection officer

- o the purposes of the processing
- o the legal basis for the processing

- o where the processing is based on a legitimate interest, details must be provided
- o the recipients or categories of recipients of the personal data
- o details of third country transfers
- o the existence of the following rights:
 - o access to personal data
 - o rectification of personal data
 - o erasure of personal data
 - o restriction of processing
 - o object to processing
 - o right to data portability
 - o right to withdraw consent
 - o the right to lodge a complaint with a supervisory authority
 - o whether the provision of personal data is optional or compulsory

CK-Tech Ltd Data Management Measures

8. CK-Tech Ltd has implemented and followed legislative guidance within its organisation, in line with the IOC direction on GDPR; however more work will be ongoing to ensure that this new legislative process is matured and improved, where required and or found as part of our rolling review process.

- Issued a Privacy Notice to all employees
- Update all employment contracts to reference GDPR requirements
- Appointed a Data protection Officer
- Conducted a GDPR Audit, which will then be repeated on a regular basis
- Issued an initial GDPR DATA Protection Policy and Instruction as a live document
- Updated the IT security to ensure business leading data security systems in its hardware and software are in place, to better secure and manage data
- Restricted management and employees' access to stored data
- Conducts weekly reviews on stored data and regular deletion of unwanted stored data
- Updates its employees through email bulletins
- Improved physical storage measure and access to documents within its Head Office

- Updated paperwork issued to clients which is GDPR compliant and has consent permissions in place to be released, that those organisations and clients are equally bound to ensure that data is equally protected by their GDPR Policy and privacy guidelines
- We can demonstrate as required, to external organisation and the we are GDPR compliant for any information that is passed to us by them

Data Breach Notification:

9. All breaches of the GPDR must result within 24hrs of the occurrence being notified to the ICO. This must be completed within 72 hours of becoming aware of the breach, where feasible. If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, you must also inform those individuals without undue delay.

10. CK-Tech Ltd would take quick responsive action and ensure that there is robust breach detection, investigation and internal reporting procedures in place through our Data Protection officer. This will facilitate decision-making about whether we need to notify the relevant supervisory authority and the affected individuals. We would also keep a record of any personal data breaches, regardless of whether you are required to notify.

K Stubberfield
Director
CK-Tech Ltd
May 2019