**Dear Data Processing Officer**

**GDPR**

European data protection was significantly revised with the adoption of the General Data Protection Regulation (GDPR) in May 2018. Cauliflower Group Ltd is committed to meeting its obligations and has a GDPR Programme to ensure compliance with these additional rules. This will be integrated with our current Data Protection Procedures and we will continue to review and update our procedures with any changes and Company developments. We are registered with ICO and have declared the information we hold.

**The key GDPR areas that were reviewed in 2018**:

* **Audit:** We have audited what data we have and its storage, access and security.
* Privacy by design: Under ICO guidance we currently only collect information from customers that is succinct and relevant for processing jobs. Under GDPR we are reviewing our security of this information both through internal security and web hosting services.
* **Governance and Accountability**: At management level we are ensuring we have reviewed and updated policies & procedures to safeguard data and demonstrate compliance. This will include data mapping and privacy impact assessments where relevant.
* **Raising awareness:** Induction and further training opportunities for our staff to ensure that we raise their awareness of data protection and company policy.
* **Consents, notices and contracts**: we are reviewed these to ensure they are updated to reflect new legal requirements.
* **Transfers:** we will continue to ensure any transfer of personal data from the European Economic Area (EEA) to America (where we outsource our data entry) comply with data security. We will move our data entry to within the EU by 2020.
* **Incident response**: we are reviewing our policy and processes to ensure we are ready for the new requirements with regard notify authorities and users of data breaches in certain circumstance.
* **Lawful Basis for Processing Data in our Marketing:** We are continuing to ensure that we market to individuals who have a 'legitimate interest' (as previous customer) in the products we offer and that they are offered an opt out from further contacts of legacy communications and opt ins for ongoing new communications.

**Cauliflower Group Ltd**

**DATA PROTECTION POLICY**

**Compliance with the Data Protection Act 1998**

**Principle 1: Processing personal data fairly and lawfully**

***•***Cauliflower Group will only use the data provided by the customer in a way that they would reasonably expect to produce their order.

***•***No personal data is passed on to third party companies.

**Principle 2: Processing personal data for specified purposes**

Cauliflower Group will only obtain customer’s personal data for the purpose of their order and that data shall not be further processed in any manner incompatible with that purpose.

**Principle 3: Holding personal data that is adequate, relevant and not excessive**

Cauliflower Group will only hold personal data about an individual that is sufficient to produce their order and future reorders.

**Principle 4: Personal data shall be accurate and, where necessary, kept up to date**

Cauliflower Group updates their customer database continuously - contact details are removed, updated and/or replaced.

**Principle 5: Duration we hold Personal Data**

Cauliflower Group only holds a modest amount of personal data. They conduct an annual audit on each registration renewal to check through the records they hold to make sure they are not holding onto personal data for longer than is required.

Users of Cauliflower Groups Online Creators can at any point permanently delete all data they have entered in the system.

Cauliflower Group will delete all personal data on any inactive accounts after a period of 36 months.

**Principle 6: Personal Data and the Right to Opt Out**

Cauliflower Group includes a tick box on Pupil Order Forms where a customer can request the submitted artwork is not used for future samples. Any referral to a customer is deleted from any images used for promotional or advertising purposes.

Cauliflower Group only contact individuals by email when their details have been obtained in the course of a sale and only contacts them about similar products and services they provide. The individual is given the opportunity to opt out of receiving further marketing messages.

**Principle 7: Security to prevent the personal data held being accidentally or deliberately compromised.**

**Premises Security**

***•***Cauliflower Group has secure alarmed premises attached to a Red Care Monitoring station.

***•***The Premises has front and rear building CCTV.

**Courier Services**

Use of Nationally recognised courier service that has received government contracts with schools in the past - including KS2 exam paper collection/deliveries.

**Third Party Enquiries**

***•***All staff to be aware of Data Protection.

***•***All staff are trained in the company security measures including:

***•***To be wary of people who may trick them into giving out personal details.

***•***Not to send offensive emails about other people, their private lives or anything else that could bring the Company into disrepute.

***•***Not to believe emails which appear to come from the bank asking for credit cards details or a password.

***•***Not to open spam.

***•***Reorders of Books will only be processed when placed through the child’s school or original customer.

***•***Reorder of School Cards can only be made using the child's unique code.

**Computer Security**

**Internal computers:**

***•***Have Microsoft Security Essential virus checking software loaded, and are set up to receive the latest patches and security updates.

***•***Incoming emails are delivered by a large email supplier 123.Reg and are scanned by Net Intelligence.

***•***Computers are scheduled to connect to the internet during office hours only and time out after a 20min period.

***•***Staff only have access to the information they need to do their job and do not share passwords.

***•***Regular backups are taken so information is not lost.

***•***All personal information is removed before disposing of old computers.

**Web and Online Service Hosting Security**

This is outsourced to a large well established company: Amazon EC2 Webservices:

As the biggest web services supplier it complies with all Physical Security and Data Transfer requirements. This is hosted in Ireland - part of the EEC.

Amazon is certified under ISO 27001:2013 (expiry of current certificate 11/07/2019. Please visit AWS for their Compliance details: [**https://aws.amazon.com/security/**](https://aws.amazon.com/security/)

**Site Online Security**

***•***Each online user for our online creator systems must register their details to receive a unique password.

***•***Our School User Passwords are set to different security levels which allow for a range of access to data - this is control by the organiser of an online project.

***•***Time settings can be controlled by a School Project Organiser to allow younger users who have passwords limited access to Cauliflower Group book Creator site. (ie school hours only)

***•***SSL certificates are in place for all data transfer requirements.

**Printed Information**

***•***All confidential paper based data is archived on site for a period of 12 months.

***•***The company then shred all sensitive material including order forms, cards and yearbooks before disposing of materials.

**Online Transactions**

***•***These are made directly through Stripe. This company complies with processing procedures for Online Payment Requirements.

***•***We do not record or store any bank card details or take over the phone payments.

**Principle 8: Protecting personal data being transferred to countries outside the EEA**

Cauliflower Group is aware they are responsible for protecting the personal information transferred to their Outsourced Data Entry Supplier. This applies to both the method used to transfer the information and the work itself. Cauliflower Group has a legal agreement with their data entry/conversion service supplier covering the data transfer assurances of security of CLIENT’s files and to Confidentiality Specific Data dealt within ‘Section 5’ of this agreement.

Below please find the data we will hold with regard school orders:

**Customer Information Audit**

* Xero Accounts Software - Invoice Details
* Cauliflower Data Base - Customer Contact Details
* Print Files used for production
* Physical Products Manufactured (before shipping)
* Data Transfers - Data entry temps or outsourced
* Online Orders details made from our Websites - (Cleared after each project)
* Emails - (cleared on regular periods)
* Accountants - holds copy of accounts
* Parents Hard Copy Order Forms (returned to schools)
* Parcel Force Database - Customer name and address

 **Data processed and held for each order**

**Paper Based Orders**

**Each order form has field for child name and order quantities**

|  |  |
| --- | --- |
| **Childs Name/Nick Name (as required by parent on printed product)** | **Written by parents- optional -data entered by data entry team** |
| **Quantity Order information - provided by parent** | **Provided by Parent - data entered by data entry team** |
| **Class Code -Letter A-Z Sticky label stuck to each class batch - to define class** - **no class names used** | **Letters attached by office staff before we scan artwork - letter will be data entered by data entry team** |
| Associate School Code - 4 digit number Assigned to school files before data entry by our office staff - **no school names used** | Automatically assigned to scanned batch using bespoke program run by the office before date entry to create file names with school code |
| Names of pupils are associated with a unique class code and unique school code only during data entry. (no location information is data entered) |

|  |  |
| --- | --- |
| Name of Organiser - with contact details | Entered online by school organiser and held on company database |
| Delivery address of Organisation  | Entered online by school organiser and held on our company database |
| School identification codes | Enter by office staff and held on our company database |

**Online Orders**

**Orders are placed online by parents**

|  |  |
| --- | --- |
| Childs Name/Nick Name (as required by parent on printed product) | Entered by Parent online - stored on our database |
| Quantity Order information - provided by parent | Entered by Parent online - stored on our database can be deleted by parent |
| Class Name | Entered by parent and changed to a LETTER by our software |
| Delivery Address - for reorders | Entered by parent online - stored on our database and can be deleted by parent |
| Accounts with unique login details and password are created. Pupils are identified by a unique code printed on their order form - the unique code identifies all files associated with the order. |

|  |  |
| --- | --- |
| Name of Organiser - with contact details | Entered online by school organiser and held on company database |
| Delivery address of Organisation  | Entered online by school organiser and held on our company database |
| School identification codes | Enter by office staff and held on our company database |

Protecting Identity:

* There are processes in place to allow individual pupils within a school, in sensitive situations to participate in our projects without names /school logos/ being associated with products if the rest of the school wish to include these features.
* School Name, Childs Name and School Logo are an optional identifying feature which schools may choose to include if they wish - this does not form a requirement for any of our projects.