

GDPR Compliance Statement for Jan Manson t/as Jan Horrox  
April 2018

This has been written after much research online and from Radio programmes. Mainly this is a response to the information supplied by the Information Commissioners Office for micro businesses and a number of phone conversations with the advice line at this organisation. A document from their website called '12 steps to take now'. All this can be found at [ico.org.uk](http://ico.org.uk)

### **1. Awareness.**

I am a sole trader with no staff or assistance of any kind. I have informed myself of what is required for my organisation. I am fully aware that the law is changing in May 2018. I work with one mac lap top and one iphone. Both are password protected. No other person has access to or uses my office. I shred all paper records promptly and regularly.

### **2. Information I hold.**

The email addresses of people who have emailed me and to whom I have replied. These are automatically saved on gmail or apple mail.

Email addresses of people who have subscribed to my newsletter by the link on the home page

Email and postal addresses for people who have ordered from my website physical items which have been shipped to them. These orders and details are saved by default to the back of my website which is hosted by Shopify. 150 Elgin St, Ottawa, ON Canada K2P1LA Shopify inc. My website [www.janhorrox.co.uk](http://www.janhorrox.co.uk) is password protected.

Email addresses and postal addresses for people who have paid to attend my workshops in the UK. These are groups who meet at a designated location usually in Somerset. These are not online. I keep these addresses for a couple of months in case I wish to send on any information or notes. After that the paper copies are shredded.

I never share this information with anyone at all. I have never shared information with anyone.

### **3. Communicating Privacy Information.**

This document is on my website as a pdf link. It is also in any newsletter communication sent out from May 2018.

Privacy information with regards to Shopify who host my website can be found in the footer of the website. Click here to see [Privacy policy](#).

Both these links to these policies will be included in my email to all newsletter subscribers.

### **4. Individuals Rights**

On request I will delete data immediately. If someone asks to see a copy of their data I can take a screen shot of this and send to them by post or email.

If they unsubscribe themselves their data is deleted.

## **5. Subject Access requests.**

If anyone requests these details I can normally respond immediately or anyway within 48 hours. On rare occasions if I am abroad, I may be unable to respond immediately and it may then take 3 weeks.

## **6. Lawful basis for processing data**

If a person has emailed me – then gmail (apple mail) will automatically save their email address. I shall never add this address to any database or spread sheet.

If someone asks to be added to my newsletter – I ask them to personally sign up on the provided place on the home page. I do not add emails to any list.

Anyone who has opted onto my subscribers list either on my website link or by buying from my website, will receive the occasional newsletter I send out with information on future workshops and /or relevant products. They will always be reminded that they can unsubscribe at any time.

If a person has bought something from my website, their postal and email addresses will be kept in a folder at the back of my Shopify website. This standard practice for purchasing online. I do not use this data for anything other than fulfilling the order and informing them of date of dispatch.

## **7. Consent**

I have never harvested or purchased email lists. Anyone on my list has actively placed themselves there.

## **8. Children.**

My operation does not involve nor is suitable for children. I have never sold to a child so I do not anticipate this to be a problem.

## **9. Data Breaches.**

I have my website and my lap top and phone password protected. If I was informed of a data breach in a system I am using I shall closely follow and seek advice as to how it should be handled.

## **10. Data Protection by Design and data Protection Impact Assessments**

I have familiarised myself with the ICO's code of practice on Privacy Impact assessments as well as guidance from the Article 29 working party. I am expecting any updates to be immediately delivered by newsletter (for which I have subscribed to my email address.

## **11. Data Protection Officer**

As I am the only person in my organisation, I have appointed myself.

## **12. International.**

I believe my lead data protection supervisory authority is the UK ICO.

