

## Data Protection Policy

### Statement

Everyone has rights with regards to how their personal information is handled. During the course of our activities we will collect, store and process personal information about our staff, customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in Solent Blind and Curtain Company and will provide for successful business operations.

Data users are obliged to comply with this policy when processing data on behalf of any entity within Solent Blind and Curtain Company. Any breach of this policy will be taken seriously and may result in disciplinary action. Disclosing personal data in breach of the Data Protection Act 1998 (the Act) may also be a criminal offence for which data users may be personally liable.

### About this policy

The types of personal data that Solent Blind and Curtain Company may be required to handle include information about current, past and prospective suppliers, clients and staff and others that we communicate with. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the Data Protection Act 1998 (the Act) and other regulations.

This policy and other documents referred to in it sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.

This policy does not form part of any employee's contract of employment and may be amended any time.

This policy sets out the rules on data protection and the legal conditions that must be satisfied when we obtain, handle, transfer and store personal data.

### Definitions of data protection terms

**Data** is information which is stored electronically on a computer, or in certain paper based filing systems.

**Data subjects** for the purpose of this policy include all living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data

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subjects have legal rights in relation to their personal data.

**Personal data** means data relating to a living individual who can be identified from that data (or from that data and other information on our possession). Personal data can be factual (such as a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.

**Data controllers** are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with the Act. Solent Blind and Curtain Company is the data controller of all personal data used in its business for its own commercial purposes.

**Data users** are those employees whose work involves processing personal data. Data users must protect the data they handle in accordance with this policy and any applicable data security procedures at all times.

**Data processors** include any person or organisation that is not a data user that processes personal data on behalf of Solent Blind and Curtain Company and on their instructions. Employees of data controllers are excluded from this definition but it could include suppliers which handle data on Solent Blind and Curtains Company's behalf.

**Processing** is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

**Sensitive personal data** includes information about a person's racial or ethnic background, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive personal data can only be processed under strict conditions, including a condition requiring the express permission of the person concerned.

## Data protection principles

Anyone processing personal data must comply with eight enforceable principles of good practice. These provide that personal data must be:

- Processed fairly and lawfully
- Processed for limited purposes and in an appropriate way
- Adequate, relevant and not excessive for the purpose

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- Accurate
- Not kept longer than necessary for the purpose
- Processed in line with data subject' rights
- Secure
- Not transferred to people or organisations situated in countries without adequate protection

### **Fair and lawful processing**

The Act is not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

For personal data to be processed lawfully, they must be processed on the basis of one of the legal grounds set out in the Act. These include, among other things, the data subject's consent to the processing, or that the processing is necessary for the performance of a contract with the data subject, for the compliance with a legal obligation to which the data controller is subject, or for the legitimate interest of the data controller or the party to whom the data is disclosed. When sensitive personal data is being processed, additional conditions must be met. When processing personal data as data controllers in the course of our business, we will ensure that those requirements are met.

### **Processing for limited purposes**

In the course of our business, we may collect and process person data. This may include data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, email or otherwise) and data we receive from other sources (including, for example, business partners, sub-contractors, credit reference agencies and others).

We will only process personal data for legitimate regulatory, client service or business purposes or for any other purposes specifically permitted by the Act. We will notify those purposes to the data subject when we first collect the data or as soon as possible thereafter.

### **Notifying data subjects**

If we collect personal data directly from data subjects, we will inform them about:

- The purpose or purposes for which we intend to process that personal data
- The types of third parties, if any, with which we will share or to which we will disclose their personal data

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- The means, if any, with which data subjects can limit our use and disclosure of the personal data

If we receive personal data about a data subject from other sources, we will provide the data subject with this information as soon as possible thereafter.

We will normally only process sensitive personal data if the subject has explicitly consented to its processing or there is a legal or regulatory obligation for us to do so. We may also process sensitive personal data where this is necessary for the purposes of equal opportunity and diversity monitoring provided this is carried out with appropriate safeguards for the individual(s) concerned. The Solent Blind and Curtain Company staff handbook contains more detailed information for staff about when sensitive personal data may be processed.

### **Adequate, relevant and non-excessive processing**

We will only collect personal data to the extent that it is required for the specific purposes notified to the data subject.

### **Accurate data**

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

Staff are responsible for checking and updating their personal data held on their employee records and must notify management of any changes to their personal circumstances.

### **Timely processing**

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy or erase from our systems, all data which is no longer required.

### **Processing in line with data subject's rights**

We will process all personal data in line with data subjects' rights, in particular their right to:

- Request access to any data held about them by a data controller
- Prevent the processing of their data for direct-marketing purposes

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- Ask to have inaccurate data amended
- Prevent processing that is likely to cause damage or distress to themselves or anyone else

## Data security

We will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those procedures or policies, or if he puts in place adequate measure himself.

We will maintain data security by protecting the confidentiality, integrity and availability of personal data, defined as follows:

- **Confidentiality** means that only people who are authorised to use the data can access it
- **Integrity** means the personal data should be accurate and suitable for the purpose for which it is processed
- **Availability** means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on the Solent Blind and Curtain Company server instead of individual PCs

Security procedures include:

- **Entry controls.** Any stranger seen in Solent Blind and Curtain Company's premises should be challenged
- **Secure lockable offices and cupboards.** Offices and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential)
- **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required.
- **Equipment.** Data users must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended

## Disclosure and sharing of personal information

Personal data may be disclosed to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose personal data we hold to the prospective seller or buyer of such business or assets

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- If we or substantially all of our assets are acquired by a third party, in which case personal data we hold will be one of the transferred assets.

If we are under a duty to disclose or share a data subject's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the data subject or other agreements; or to protect our rights, property or safety of our employees, customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### Dealing with subject access requests

Data subjects must make a formal request in writing for information we hold about them and pay the statutory fee. Employees who receive a written request should forward it immediately to management.

The data controller may refuse to provide certain personal data in response to a request from an individual where the ACT provides an exemption, such as where the personal data:

- Is processed for management forecasting or management planning purposes, where providing the personal data to the individual concerned would prejudice the conduct of relevant entity's business
- Records the Company's intentions in relation to any negotiations with the individual concerned, where providing such personal data would prejudice those negotiations

When receiving telephone enquiries we will only disclose personal data we hold on our systems if the following conditions are met:

- We will check the caller's identity to make sure that information is only given to a person who is entitled to it
- We will suggest that the caller put their request in writing if we are not sure about the caller's identity and where their identity cannot be checked

Our employees will refer a request to their line manager for assistance in difficult situations. Employees should not be bullied into disclosing personal information.

### Notifications to and communications with the Information Commissioner's Office (ICO)

The ICO maintains a public register of all data controllers registered to process

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personal data. Management is responsible for ensuring compliance with the Act's requirements for Solent Blind and Curtain Company to register the fact that they collect and use particular categories of personal data with the ICO.

Any correspondence, apart from that relating to the notification process received, from the ICO should be sent to management as soon as possible on receipt.

## Implementation, enforcement and reporting breaches

We will provide all staff with training about privacy to support compliance with this policy.

We will develop, maintain, and publish, guidance and standards to assist achievement of compliance with this policy.

All staff have a responsibility to report breaches of this policy to management.

This policy will be communicated to all persons working for and on behalf on Solent Blind and Curtain Company.

This policy will be reviewed annually but the Company will continually endeavour to improve our practices.

## Version control

This is a non-contractual policy, and as such the Company reserves the right to modify this policy at any time. Reasonable notice of any changes will be provided. Reasons for any modification may include: employment legislation or other guideline changes.

<b>Document title</b>	Data Protection Policy
<b>Version number</b>	3
<b>Author of document</b>	Company Secretary
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<b>Authorising authority</b>	David Summers, General Manager

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## GDPR Policy

### Statement

Solent Blind and Curtain Company Limited are committed to a policy of protecting the rights and privacy of individuals, in accordance with the General Data Protection Regulation (GDPR). GDPR contains provisions that the company will need to be aware of as data controllers, including provisions intended to enhance the protection of personal data.

### Introduction

GDPR requires that:

Solent Blind and Curtain Company needs to process certain information about its staff, customers, suppliers, and other individuals with whom it has a relationship for various purposes such as, but not limited to:

- The recruitment and payment of staff
- The day to day purchasing and sale of goods
- The making or receiving of payments as part of day to day trading
- To contact individuals about a submission or request made for information
- In relation to any correspondence we receive regarding our products and services
- Complying with legal obligations

To comply with various legal obligations, including the obligations imposed on it by GDPR, Solent Blind and Curtain Company must ensure that all this information is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

### Compliance

All members of staff are responsible for ensuring that any personal information which they hold is kept securely and not disclosed to any unauthorised third parties. Solent Blind and Curtain Company will ensure that all personal information is accessible only to those who have a valid reason for using it. Solent Blind and Curtain Company will have in place appropriate security measures to protect information physically and electronically.

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As a matter of best practice, other agencies or individuals working with Solent Blind and Curtain Company and who have access to personal information, will be expected to read and comply with this policy. It is expected that departments who are responsible for dealing with external bodies will take the responsibility for ensuring that such bodies comply with this policy.

Consent as a basis for processing information although not always necessary is the best way to ensure that information is collected and processed in an open and transparent manner. Consent is especially important when Solent Blind and Curtain Company is processing any sensitive information, as defined by the legislation. Solent Blind and Curtain Company understands consent to mean that the individual has been fully informed of the intended processing and has signified their agreement.

Solent Blind and Curtain Company also confirms consent cannot be inferred from non-response to a communication.

This policy will be updated as necessary to reflect best practice in information management, security, and control and to ensure compliance with any changed or amendments to the GDPR and other relevant legislation.

This policy applies to all staff and anyone working on behalf of Solent Blind and Curtain Company. Any breach of this policy or of the Regulation itself will be considered an offence and the companies' disciplinary procedures may be invoked.

### **Responsibility**

Responsibilities under GDPR, Solent Blind and Curtain Company will be the 'data controller' under the terms of the legislation. This means it is ultimately responsible for controlling the use and processing of personal data.

Management is responsible for all day-to-day data protection matters and will be responsible for ensuring that all members of staff and relevant individuals abide by this policy, and for developing and encouraging good information handling within the company.

Management is also responsible for ensuring that the Companies policy is kept up to date. Details of this policy can be found on the Solent Blinds website.

Compliance with the legislation is the personal responsibility of all staff at Solent Blind and Curtain Company who process personal information.

Individuals who provide personal data to Solent Blind and Curtain Company are responsible for ensuring that the information is accurate and up-to-date.

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## Data Protection Principles

To comply with its obligations, Solent Blind and Curtain Company undertakes to adhere to the eight principles:

### 1. Process personal data fairly and lawfully (the right to be informed)

Solent Blind and Curtain Company will make all reasonable efforts to ensure that individuals who are the focus of personal identifying information (PII) are informed of the identity of the data controller, the purposes of processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

The Company will ensure that the is adequate, relevant and not excessive in relation to the purpose for which it is processed. Solent Blind and Curtain Company will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained.

The Company will process the data for the specific and lawful purpose for which it was collected and not further process the data in a manner incompatible with this purpose. The Company will ensure that the reason for which it collected the data originally is the only reason for which it processes that data, unless the individual consents to any additional processing before it takes place.

Solent Blind and Curtain Company undertakes not to disclose personal data to unauthorised third parties. Legitimate disclosures may occur in the following instances:

- Where the individual had given their consent to the disclosure
- The disclosure is required for the performance of a contract

There are other instances when the legislation permits disclosure without the consent of the individual.

CCTV. There is a CCTV system operating within Solent Blind and Curtain Company's premises for the purpose of protecting staff and property. Solent Blind and Curtain Company will only process personal data obtained by the CCTV system in a manner which ensures compliance with the legislation.

### 2. Subject access rights (SARs) (the right of access)

Individuals have a right to access any personal data relating to them which is held by Solent Blind and Curtain Company.

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We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about anyone on our files.

Any individual wishing to exercise this right should apply in writing to the manager.

Any member of staff receiving a SAR should forward this to the manager.

To ensure security we require you to prove your identity with 2 pieces of approved identification before any SAR request can be released.

### 3. Keep personal data accurate (the right to rectification)

It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and each individual should notify the Company if a change in circumstances mean that the data needs to be updated.

It is the responsibility of the Company to ensure that any notification regarding the change is noted and acted on.

### 4. Only keep personal data for as long as is necessary (the right to erase)

Solent Blind and Curtain Company undertakes not to retain personal data longer than is necessary to ensure compliance with GDPR legislation, and other statutory requirements.

This means Solent Blind and Curtain Company will undertake a periodic review of the information held and implement a purge process as required.

Solent Blind and Curtain Company will dispose of any personal data in a way that protects the rights and privacy of the individual concerned.

### 5. Restrict the process of personal information

Individuals have the right to prevent processing of information while that information is subject to corrective action.

At any time a persona can request to know what information is stored and request action to rectify, block, erase or destroy inaccurate information while that process is underway.

### 6. Ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

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Solent Blind and Curtain Company will not transfer data to such territories without the explicit consent of the individual. This also applies to publishing information on the internet – because transfer of data can include placing data on a website that can be accessed from outside the EEA – so Solent Blind and Curtain Company will always seek the consent of individuals before placing any personal data (including photographs) on its website.

If Solent Blind and Curtain Company collects personal data in any form via its website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.

7. The right to object allows an individual to prevent processing for purposes for:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- Direct marketing (including profiling)
- Processing for purposes of scientific/historical research and statistics

8. Rights to automated decision making and profiling

- Automated individual decision-making (making a decision solely by automated means without any human involvement)
- Profiling (automated processing of personal data to evaluate certain things about an individual)

## Incident Response

GDPR has a duty to report certain types of personal data breach to the relevant supervisory authority. Where feasible, Solent Blind and Curtain Company will do this within 48 hours of becoming aware of the breach.

If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, Solent Blind and Curtain Company will also inform those individuals without undue delay.

## Implementation, enforcement and reporting breaches

We will provide all staff with training about privacy to support compliance with this policy.

We will develop, maintain, and publish, guidance and standards to assist achievement of compliance with this policy.

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All staff have a responsibility to report breaches of this policy to management.

This policy will be communicated to all persons working for and on behalf on Solent Blind and Curtain Company.

This policy will be reviewed annually but the Company will continually endeavour to improve our practices.

## Version control

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<b>Document title</b>	GDPR Policy
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<b>Authorising authority</b>	David Summers, General Manager

## Anti-Virus Protection Policy

### Introduction

This policy describes the measures taken by Solent Blind and Curtain Company to counter malicious software and the responsibilities of individuals in protecting against viruses.

### Scope

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This document contains the Anti-virus policy details including actions to be taken if non-compliance occurs. This policy applies to all staff authorised to use/access IT systems and communications networks.

## Configuration Standards

- Approved anti-virus software must be correctly installed and configured on all systems
- Anti-virus must be kept up to date including the definition files
- Anti-virus software must be configured for real time scanning and regular scheduled scans
- All IT equipment and removable media must be scanned for viruses and malware before being introduced or prior to use on any computer or laptop
- Users must not accept, or run, software from non-trusted sources
- Users must not undertake activities with the intention to create and/or distribute malicious programs
- Users must inform the IT company and management if a virus is detected on any system
- All systems infected with a malware/virus that the anti-virus software has not been able to deal with must be disconnected and quarantined

## Monitoring and Compliance

Solent Blind and Curtain Company will endeavour to achieve 100% compliance to this policy and will ensure that all staff follow this policy accordingly.

## Non-Conformance

Any system found to be without adequate protection as defined by this policy will be removed from the network until adequate protection is implemented.

Any user found to be wilfully violating the Anti-virus policy may be subject to disciplinary action.

In the event of a virus breakout, the company reserves the right to temporarily remove equipment, or disable parts of the network to safeguard other systems.

## Procedure for Suspected Infection

If a user suspects that the system or a computer may be infected, the following actions must be taken.

- Inform the IT company and management immediately

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- Switch off the machine
- Ensure no-one else uses the machine
- Be prepared to inform the IT company of any actions taken which may have caused the infection

The IT company will:

- Check the infected machine and any media
- Rebuild the machine if the infection is severe
- Check any servers that may have been accessed from the infected system
- Attempt to determine the source of the infection
- Ensure the incident is logged

## Implementation, enforcement and reporting breaches

We will develop, maintain, and publish, guidance and standards to assist achievement of compliance with this policy.

All staff have a responsibility to report breaches of this policy to management.

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Sign:



Company Secretary

Date: 1<sup>st</sup> June 2023

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