

## General Data Protection Regulation Policy for Angelcasts

### 1. Introduction

Angelcasts needs to collect and use certain types of information about the Individuals who come into contact with Angelcasts in order to carry on our work. This personal information must be collected and dealt with appropriately whether it is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the General Data Protection Regulation

### 2. Data Controller

Angelcasts is the Data Controller under the Regulation, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

### 3. Disclosure

Angelcasts may share data with other agencies such as the HMRC or Engraving & Stamp Making Associates.

The Individual will be made aware in most circumstances of how and with whom their information will be shared. There are circumstances where the law allows Angelcasts to disclose data (including sensitive data) without the data subject's consent.

These are:

- a) Carrying out a legal duty or as authorised by the HMRC
- b) Conducting any legal proceedings, obtaining legal advice or defending any legal rights

Angelcasts regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. We will only store personal data such as addresses & contact information in our accounts. We will however sometimes need to send fingerprints or handprints to a third party Engraver. However everything is sent by a registered number through our own system so the third party will not know your identity & only receive an image of the fingerprint or handwriting sample to carry out your order.

Angelcasts intends to ensure that personal information is treated lawfully and correctly.

To this end, Angelcasts will adhere to the Principles of Data Protection, as detailed in the General Data Protection Regulation.

Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- b) Shall be obtained only for one or more of the purposes specified in the regulation, and shall not be processed in any manner incompatible with that purpose or those purposes,

- c) Shall be adequate, relevant and not excessive in relation to those purpose(s)
- d) Shall be accurate and, where necessary, kept up to date for all past & future written permissions for sharing images of casts, fingerprints, framed photos of children & engraved jewellery.
- e) We will now blur out all engraving information on frames especially where the image of a child is used, effective from the 25<sup>th</sup> of May.
- f) The individual will not be contacted except for the terms of the service they have booked with Angelcasts.
- g) The individual will only receive contact outside of the service of Angelcasts if they have opted in for the Mailing List as of the 25<sup>th</sup> of May. The mailing list will have an easy opt out option for the individual should they wish to discontinue this form of contact.
- h) We will keep a record of all written consent to share images of fingerprints, jewellery, personal engravings, photos of children with casts & images of & from clients of their casting session.
- i) Shall not be kept for longer than is necessary
- j) Shall be processed in accordance with the rights of data subjects under the new General Data Protection Regulation
- k) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- l) Shall not be transferred to a country or territory outside the European Economic Area.

Angelcasts will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the regulation. These include:
  - o The right to be informed that processing is being undertaken,
  - o The right of access to one's personal information
  - o The right to prevent processing in certain circumstances
  - o The right to correct, rectify, block or erase information
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards

- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

#### 4. Data collection

Informed consent is when

- An Individual clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

Angelcasts will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, Angelcasts will ensure that the Individual:

- a) Clearly understands why the information is needed
- b) Understands what it will be used for and what the consequences are should the Individual decide not to give consent to processing
- c) As far as reasonably possible will get in touch with previous clients & obtain written permissions. As of May 2018 every individual who uses the service of Angelcasts will be asked to provide written permission for the sharing of personal data such as; castings with images of children, fingerprints, handprints, engraved jewellery & images of & from clients of their casting session. If the individual does not wish to give their permission, this will also be recorded.
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress & on behalf of their child
- e) Has received sufficient information on why their data is needed and how it will be used

#### 5. Data Storage

Information and records relating to Individuals will be stored securely with access only from Ami of Angelcasts.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is Angelcasts responsibility to ensure all personal and company data is nonrecoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

#### 6. Data access and accuracy

All Individuals have the right to access the information Angelcasts holds about them.

In addition, Angelcasts will ensure that:

- All personal information & sensitive data is stored securely on a hard drive with firewall protection.

- All physical sensitive data such as: fingerprints, handprints, handwriting samples are stored in a paper filing system securely locked away from any online potential data breach
- All images of children with casts from May 25<sup>th</sup> will now feature a blurred engraving to remove identifiable information online as standard.
- All castings will require a written consent form where you will be able to confirm exactly where & what you are happy to share about your casting.
- By ordering online you confirm for your personal data to be shared with WIX & PAYPAL or SAGAPAY depending on payment preference. This data will then be removed after 1 year.
- Anybody wanting to make enquiries about handling personal information can contact Ami from Angelcasts on [info@angelcasts.co.uk](mailto:info@angelcasts.co.uk) to request the removal of their personal data.
- All orders taken online will be confirmed by email to get written consent about sharing the images of the work & how it will be shared & if you want to limit the information shared.
- It deals promptly and courteously with any enquiries about handling personal information
- It will regularly review and audit the ways it holds, manage and uses personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with the new General Data Protection Regulation.

In case of any queries or questions in relation to this policy please contact the Ami Crabb, Sole Trader of Angelcasts.