



Fairwater Garage (Taunton) Ltd

144A Priorswood Road, Taunton,
Somerset TA2 8DN
01823 277268
info@fairwater-garage.com
www.fairwater-garage.com



GDPR Policy

Introduction

The **EU General Data Protection Regulation ("GDPR")** comes into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

Our Commitment

Fairwater Garage (Taunton) Ltd are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR.

Fairwater Garage (Taunton) Ltd are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been summarised in this statement and includes the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

How We are Preparing for the GDPR

Fairwater Garage (Taunton) Ltd already have a consistent level of data protection and security across our organisation, however it is our aim to be fully compliant with the GDPR by 25th May 2018.

Information Audit – we have carried out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed. We have reviewed all customer details held and have deleted all records prior to 31st August 2010. Details from this date onwards are required for taxation reasons. This exercise will be repeated annually to ensure that no unnecessary information is held in the future.

Records are held for the purpose of issuing MOT service reminders and generally consist of name, phone numbers and car details. Contact will be made to ensure that these dates are not missed and as such are considered service required contact. When these MOT's are subsequently booked confirmation will be sought that subsequent contact in the form of an SMS reminder is required. All new customers will be advised about the implications of GDPR and whether contact of this type is required ongoing and a tick box will need to be completed to confirm that an SMS message is authorised. A custom box on our software confirming that GDPR was discussed will be completed. All existing customers will be advised about GDPR and methods of preferred contact will be confirmed along with the custom box being completed. This information is not disclosed to any third parties for any marketing purposes.

- **Policies & Procedures - [revising/implementing new]** data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including: -
 - **Data Protection** – our main policy and procedure document for data protection has been overhauled to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals.
 - **Data Retention & Erasure** – we have updated our retention policy and schedule to ensure that we meet the 'data minimisation' and 'storage limitation' principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new 'Right to Erasure' obligation and are aware of when this and other data subject's rights apply; along with any exemptions, response timeframes and notification responsibilities. A diary note recurring reminder has been added to Sage in order that date is reviewed and deleted where not required on an annual basis.
 - **Data Breaches** – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.
 - **Third-Party Disclosures** – where Fairwater Garage (Taunton) Ltd stores or transfers personal information our procedures include a review of any third parties and we carry out strict due diligence checks with all recipients of personal data to assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.
 - **Subject Access Request (SAR)** – we have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge.
- **Legal Basis for Processing** - we are reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
- **Privacy Notice/Policy** – Fairwater Garage (Taunton) Ltd are revising our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information. A link to this policy will be added to our website.

- **Obtaining Consent** – Fairwater Garage (Taunton) Ltd are revising our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information.
We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, and an easy to see and access way to withdraw consent at any time. Consent to continue sending MOT reminders to existing customers will be requested on completion of the MOT and new customers will be required to confirm consent for details to be held and how we are allowed to contact them.
- **Direct Marketing** – Fairwater Garage (Taunton) Ltd are revising the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials. We currently do not undertake any form of direct marketing and any future campaigns would be run with a specific opt in request and would not be issued on mass to all customers.
- **Processor Agreements** – where we use any third-party to process personal information on our behalf (*i.e. Payroll, Health & Safety, Training, Hosting etc*), due diligence procedures have ensured that they (*as well as we*), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organisational measures in place and compliance with the GDPR.

Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy to access information via our website of an individual's right to access any personal information that Fairwater Garage (Taunton) Ltd processes about them and to request information about: -

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (*where applicable*) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

Information Security & Technical and Organisational Measures

Fairwater Garage (Taunton) Ltd takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures.

Fairwater Garage (Taunton) Ltd understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans. We have implemented an employee training program specific to the which will be provided to all employees prior to May 25th 2018, and forms part of our induction and annual training program.

Paul Liell

Director

Fairwater Garage (Taunton) Ltd

1st May 2018