



**WKW PRECISION ENGINEERING**

**DATA PROTECTION POLICY**

**IN COMPLIANCE WITH THE**

**GENERAL DATA PROTECTION  
REGULATIONS**

**WITH EFFECT FROM**

**MAY 25TH 2018**

## Data Protection Policy

### 1. Introduction

**WKW Precision Engineering Co. Ltd.** needs to collect and use certain types of information about Individuals working within companies that have a specific requirement for the services offered by **WKW Precision Engineering** or are providing a service such as a supplier. This personal information is vital for communications that need to be carried out for a customer/supplier relationship and must be collected and dealt with appropriately, whether it is collected on paper, stored in a computer database, kept on a company smart-phone or recorded on other material and that there are safeguards in place to ensure this information is in compliance with the G.D.P.R. (General Data Protection Regulations) effective from 25<sup>th</sup> May 2018

### 2. Data Controller

**WKW Precision Engineering Co. Ltd.** is the Data Controller under the GDPR, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioners Office and the individual of any Data breaches that might occur within a 72 hour time frame.

### 3. Disclosure

**WKW Precision Engineering Co. Ltd.** Will **NOT** share personal information with any third party organisations or other companies unless consent has been given by an individual to do so.

The individual of a customer/supplier will be made aware of, in most circumstances of how and if required under law, with whom their information will be shared, providing those circumstances where the law allows WKW Precision Engineering to disclose data (including sensitive data) without the data subject's consent.

These circumstances are:

- a) Carrying out a legal duty or as authorised by the Information Commissioners Office.
- b) Protecting vital interests of an individual of a customer/supplier or other person
- c) The individual of a customer/supplier has already made the information public and has agreed consent for their details to be disclosed to another entity.

- d) For conducting any legal proceedings, obtaining legal advice or defending any legal rights.
- e) Monitoring for equal opportunities purposes – i.e. race, disability or religion
- f) Providing a confidential service where the Individual of a customer/supplier and consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill individuals of customers/suppliers to provide consent signatures.

**WKW Precision Engineering Co. Ltd.** 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.

**WKW Precision Engineering Co. Ltd.** Intends to ensure that personal information is collected correctly and in accordance with the GDPR guidelines.

To this end, **WKW Precision Engineering Co. Ltd.** will adhere to the Principles of Data Protection, as detailed in the General Data Protection Regulations effective from the 25<sup>th</sup> May 2018

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 Regulations, 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,
- e) Shall not be kept for longer than is necessary
- f) Shall be processed in accordance with the rights of individuals of customers/suppliers under the Regulations,
- g) 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,

- h) Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/customers in relation to the processing of personal information.

**WKW Precision Engineering Co. Ltd.** 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 is accurate and used only for the purposes of developing customer relations and offering a “Competitive, Reliable, Quality Service.”
- Ensure that the rights of people about whom information is held, can be fully exercised under the GDPR. These include:
  - The right to be informed that processing is being undertaken,
  - The right of access to one’s personal information
  - The right to prevent processing in certain circumstances and
  - The right to correct, rectify, block or erase information which is regarded as wrong information)
  - The right for an individual to have their details erased from stored data within the company.
- 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 of a Customer/Supplier or potential customer clearly understands why their information is needed and
- Has agreed to have their personal information stored on the company database.

**WKW Precision Engineering Co. Ltd.** will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, by completing a form through the website, by direct mail or by e-mail marketing.

When collecting data, **WKW Precision Engineering Co. Ltd.** will ensure that the Individual of a Customer:

- a) Clearly understands why the information is needed
- b) Understands what it will be used for and what the consequences are should the Individual of a Customer/Supplier decides not to give consent to processing.
- c) As far as reasonably possible, grants explicit consent, either written, verbal or by e-mail for data to be processed.
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- 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 of customers/suppliers will be stored securely and will only be accessible to authorised employee's.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately by complete erasure from the company database.

It is the responsibility of **WKW Precision Engineering Co. Ltd.** to ensure that all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on or sold to a third party.

## **6. Data access and accuracy**

All Individuals of Customers/Suppliers have the right to access the information **WKW Precision Engineering Co. Ltd.** holds about them.

**WKW Precision Engineering Co. Ltd.** will also take reasonable steps to ensure that this information is kept up to date by asking data subjects whether there have been any changes to their details such moving to another company and as such a change to their e-mail address.

In addition, **WKW Precision Engineering Co. Ltd.**

will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice.
- Everyone processing personal information is appropriately trained to do so.
- Everyone processing personal information is appropriately supervised.
- Anybody wanting to make enquiries about handling personal information knows what to do.
- It deals promptly and courteously with any enquiries about handling personal information.
- It describes clearly how it handles personal information
- It will regularly review and audit the ways it hold, manage and use personal information.
- It regularly assesses and evaluates its methods and performance in relation to handling personal information.
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made by the General Data Protection Regulations from 25<sup>th</sup> May 2018

In case of any queries or questions in relation to this policy please contact the

**Data Protection Officer:**

**Data Controller:** WKW Precision Engineering Co. Ltd.

**Data Protection Officer:** Max Wyatt

**Data Processors:**

Adrian Wyatt, Director.  
Richard Booth, Operations Manager.  
Chris Steele, Quality Manager.  
Amy Roper, Finance & Admin Officer.  
Stuart Watson, H.S.E. & Human Resources  
Karen Olivant, Office Administrator  
John Huck, Quality Assistant  
Maria Austin, Office Administrator  
Brian Kermode, Business Development & Marketing

Signed: *Adrian Wyatt*

Position: Director

Date: 24<sup>th</sup> May 2018

Review Date: 23<sup>rd</sup> May 2019

## **Glossary of Terms**

**Data Controller** – Is WKW Precision Engineering Co. Ltd.

**General Data Protection Regulations** – The new European legislation that provides a framework for responsible behaviour by those using personal information.

**Data Protection Officer** – The person responsible for ensuring that WKW Precision Engineering follows its data protection policy and complies with the GDPR Regulations.

**Data Processors** – The people that need to use the personal information in order to carry out duties for the interests of WKW Precision Engineering Co. Ltd.

**Individual of Customers/Suppliers** – The person whose personal information is being held or processed by the Data Processors, for example: a purchasing manager or person within the purchasing department of a company, a person responsible for supplying goods to WKW Precision Engineering or any individual that needs to be in contact with the company in order to carry out duties for that customer/supplier.

**Explicit consent** – is a freely given, specific and informed agreement by an individual of a customer or potential customer/supplier in the processing of personal information about her/him and that explicit consent is needed for the company before processing of the sensitive data.

**Notification** – Notifying the Information Commissioners Office about the data processing activities of WKW Precision Engineering Co. Ltd, as certain activities may be exempt from notification.

**Information Commissioner** – The UK Information Commissioner responsible for implementing and overseeing the GDPR Regulations.

**Processing** – means collecting, amending, handling, storing or disclosing personal information.

**Personal Information** – Information about living individuals that enables them to be identified – e.g. name and address, company address, telephone number, e-mail address or company title. It does not apply to information about organisations, companies or agencies but applies to named persons, such as individual volunteers or employees within a (GROUP).

**Sensitive data** – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings