# **Data Protection Policy**



#### Introduction

Impact Mail & Print are required to maintain and process certain personal data about living individuals for the purposes of satisfying operational and legal obligations. The Company recognises the importance of the correct and lawful treatment of personal data; it maintains confidence in the organisation and provides for successful operations.

The types of personal data that Impact Mail & Print may require include information about current, past, and prospective employees; suppliers, customers and others with whom it communicates. This personal data, whether it is held on paper, on computer, or other media, will be subject to the appropriate legal safeguards as specified in Data Protection Legislation.

Impact Mail & Print fully endorses and adheres to the principles of Data Protection. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation, and storage of personal data. Employees and others who obtain, handle, process, transport and store personal data for the Company must adhere to these principles.

## **Principles**

The principles require that personal data shall:

- Principles relating to data processing
- Lawfulness of processing
- Conditions of consent
- Conditions applicable to child's consent in relation to information society services
- · Processing of special categories of personal data
- Processing of data relating to criminal convictions or offences
- Processing which does not require identification

# Satisfaction of Principles

In order to meet the requirements of the principles, the Company will:

- observe fully the conditions regarding the fair collection and use of personal data;
- meet its obligations to specify the purposes for which personal data is used;
- collect and process appropriate personal data only to the extent that it is needed to fulfil operational
  or any legal requirements;
- ensure the quality of personal data used;
- apply strict checks to determine the length of time personal data is held;
- ensure that the rights of individuals about whom the personal data is held, can be fully exercised under the legislation;
- take the appropriate technical and organisational security measures to safeguard personal data;
- and ensure that personal data is not transferred abroad without suitable safeguards

#### **Data Controller**

The Company's designated Data Controller is the Company Secretary and is responsible for ensuring compliance with Data Protection legislation and implementation of this policy throughout the various business activities.

Any questions or concerns about the interpretation or operation of this policy are to be taken up in the first instance with the appropriate management, where action is not taken or further guidance is required the Information Commissioners Office are to be contacted.

Further guidance on Data Protection and the procedures can be gained from the ICO GDPR, contact details are available online as and when required.

If the matter is not resolved satisfactorily then the concern should be raised with the data protection officer and you are reminded that you may also raise a grievance in accordance with the Company's grievance policy and procedures.

## Status of the Policy

Any employee who considers that the policy has not been followed in respect of personal data about themselves are to raise the matter with their Line Manager or the Data Controller in the first instance.

#### **Data we Collect**

Impact Mail & Print receive data in a number of ways, including but not limited to website activity, marketing sources, and business events.

We may collect the following information:

- Your name, the business you work for and its contact details including email address and phone number
- Demographic information such as postcode, preferences, and interests
- Website & communication usage data
- Marketing and communication preferences
- Relevant product requirements and interests when enquiring or placing an order
- Other information pertaining to offers and surveys
- Other publicly available data you have shared via a public platform such as on social media or message boards
- Impact Mail and Print may collect other information with reference to individuals or Companies to assist with the business activities

#### How we use Data

Collecting this data helps us understand what you are looking for from us, which enables us to improve our products and services.

We may use data for internal records:

- To improve the products and services we provide
- To personalise the website for you
- To contact you regarding an enquiry or work you have requested
- To contact you via email, telephone or mail for market research reasons
- To send you promotional emails, mail or call you about our products, services, or anything else that might be relevant to you
- For our own internal records

#### **Sharing Data:**

- We may need to use your data with third parties to make certain services available to you
- Delivery service providers
- Marketing providers
- IT professionals
- Our investors
- Credit reference agencies (only when necessary for credit checking)
- Government bodies, law enforcement agents, regulars, insurers, and courts/tribunals only where required to do so

Every effort will be made by Impact Mail & Print to ensure that where data is shared that access to this is controlled in line with expectations and that appropriate policies and procedures are in place.

#### **Subject Access**

All individuals who are the subject of personal data held by the Company are entitled to:

- ask what information the Company holds about them and why
- · ask how to gain access to it
- be informed how to keep it up to date
- be informed what the Company is doing to comply with its obligations under Data Protection legislation that is in place

#### **Employee Responsibilities**

All employees are responsible for:

- checking that any personal data that they provide to the Company is accurate and up to date
- inform the Company of any changes to information which they have provided e.g. change of address
- checking any information that the Company may send out from time to time, giving details of information that is being kept and processed

If, as part of their responsibilities, employees collect information about other people (e.g. about customers or personal circumstances, or about other employees) they must comply with the Policy and with the Data Protection Procedures.

# **Data Security**

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted. Data will only be accessible to those who need to and are authorised to use it. All personnel are responsible for ensuring that:

- any personal data which they hold is kept securely
- personal information is not disclosed either orally or in writing or otherwise to any unauthorised third party

# **Rights to Access Information**

Employees and other subjects of personal data held by the Company have the right to access any personal data that is being kept about them on computer and also have access to paper-based data held in certain manual filing systems.

This right is subject to certain exemptions, which are set out it in Data Protection Legislation. Any person who wishes to exercise this right should:

- Make the request in writing to the Company's Data Controller, giving three days' notice
- The file may not be removed from the Human Resources Office
- The employee must inform the Human Resources Manager if they wish to copy any documentation

The access request will not incur a charge to the Data Subject in line with GDPR. If personal details are inaccurate, they can be amended upon request.

Impact Mail & Print aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days of receipt of a completed form unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

### **Subject Consent**

The need to process data for normal purposes has been communicated to all data subjects. In some cases if the data is sensitive, for example information about health, race, or gender, express consent to process the data must be obtained. Processing may be necessary to operate the Company's policies, such as health and safety and equal opportunities.

Customers and data subjects have the right to withdraw consent at any time. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn. To withdraw consent, you can email us or write to us at the addresses at the bottom of this page.

Website, Email Data

Occasionally our website may contain links to other websites that we have no control of. We are not responsible for your data's protection and privacy for any information you provide to these websites. Emails may be monitored, and telephone calls may be recorded for the following purposes:

- Establishing facts and evidence for business transactions
- Investigating or detecting the unauthorised use of our communication systems
- Ensuring compliance with regulatory or self-regulatory practices
- Ascertaining and demonstrating that standards are being met
- Preventing or detecting crime
- Defending national security
- Safeguarding the effective operation of our communication systems

#### **Retention of Data**

Impact Mail & Print will keep some forms of information for longer than others in accordance with business, financial, and legal obligations. All personnel are responsible for ensuring that information is not kept for longer than necessary.

# **Breach of Policy**

Any employee who knowingly or recklessly uses, discloses or otherwise processes data in breach of this policy will be subject to disciplinary proceedings including, where appropriate, dismissal for gross misconduct, and may also face criminal charges.

E-Signed: N Sherwood, Company Director

**Date:** Aug 2022