



Technology
Provider
Gold 2020



General Data Protection Regulations Policy

Contents

1. Overview	2
2. General Data Protection Regulations	2
3. People, risks and responsibilities	3
4. Responsibilities	4
5. General staff guidelines	5
6. Data storage	5
7. Data use	6
8. Data accuracy	7
9. Subject access requests	7
10. Disclosing data for other reasons	8
11. Providing information	8
Glossary	8
Document Control	8
Authorisation	8
Employee Signature	9

Skratch Enterprises Limited is part of Skratch Corporation Limited Trading as Skratch AV

Address: Unit 37/38 Ketley Business Park, Ketley, Telford, TF1 5JD

Contact Telephone Number: 01952 872360 Email: accounts@skratchav.com Website: www.skratchav.com

VAT Number: 834531633

Registration Number: 5050095



Technology
Provider
Gold 2020



1. Overview

Introduction

Skratch Enterprises Limited needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees, and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled, and stored to meet the company's data protection standards — and to comply with the legal requirements placed upon the Company by the General Data Protection Regulations.

Why this policy exists

This data protection policy ensures Skratch Enterprises Limited:

- Complies with the General Data Protection Regulations and follows good practice
- Protects the rights of staff, customers, and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

2. General Data Protection Regulations

The General Data Protection Regulations describes how organisations — including Skratch Enterprises Limited — must collect, handle, and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The General Data Protection Regulations are underpinned by six important principles. These principles say that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay.

Skratch Enterprises Limited is part of Skratch Corporation Limited Trading as Skratch AV

Address: Unit 37/38 Ketley Business Park, Ketley, Telford, TF1 5JD

Contact Telephone Number: 01952 872360 Email: accounts@skratchav.com Website: www.skratchav.com

VAT Number: 834531633

Registration Number: 5050095



Technology
Provider
Gold 2020



- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

3. People, risks, and responsibilities

Policy scope

This policy applies to:

- The head office of Skratch Enterprises Limited
- All branches of Skratch Enterprises Limited
- All staff and volunteers of Skratch Enterprises Limited
- All contractors, suppliers and other people working on behalf of Skratch Enterprises Limited

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the General Data Protection Regulations. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Any other information relating to individuals

Data protection risks

This policy helps to protect Skratch Enterprises Limited from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

Skratch Enterprises Limited is part of Skratch Corporation Limited Trading as Skratch AV

Address: Unit 37/38 Ketley Business Park, Ketley, Telford, TF1 5JD

Contact Telephone Number: 01952 872360 Email: accounts@skratchav.com Website: www.skratchav.com

VAT Number: 834531633

Registration Number: 5050095



Technology
Provider
Gold 2020



4. Responsibilities

Everyone who works for or with Skcratch Enterprises Limited has some responsibility for ensuring data is collected, stored, and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The **Directors** are ultimately responsible for ensuring that Skcratch Enterprises Limited meets its legal obligations.
- The **Directors** are responsible for:
 - Keeping Management updated regarding data protection responsibilities, risks, and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Arranging data protection training and advice for the people covered by this policy.
 - Handling data protection questions from staff and anyone else covered by this policy.
 - Dealing with requests from individuals to see the data Skcratch Enterprises Limited holds about them.
 - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - Evaluating any third-party services, the company is considering using to store or process data. For instance, cloud computing services.
 - Approving any data protection statements attached to communications such as emails and letters.
 - Addressing any data protection queries from journalists or media outlets like newspapers.
 - Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

Skratch Enterprises Limited is part of Skcratch Corporation Limited Trading as Skcratch AV

Address: Unit 37/38 Ketley Business Park, Ketley, Telford, TF1 5JD

Contact Telephone Number: 01952 872360 Email: accounts@skratchav.com Website: www.skratchav.com

VAT Number: 834531633

Registration Number: 5050095



Technology
Provider
Gold 2020



5. General staff guidelines

- The only people able to access data covered by this policy should be those who **need it for their work**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line managers.
- **Skratch Enterprises Limited will provide training** to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, **strong passwords must be used** and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within the company or externally.
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees **should request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection.

6. Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

Skratch Enterprises Limited is part of Skratch Corporation Limited Trading as Skratch AV
Address: Unit 37/38 Ketley Business Park, Ketley, Telford, TF1 5JD
Contact Telephone Number: 01952 872360 Email: accounts@skratchav.com Website: www.skratchav.com

VAT Number: 834531633

Registration Number: 5050095



Technology
Provider
Gold 2020



When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion, and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers** and should only be uploaded to an **approved cloud computing service**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should **never be saved directly** to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by **approved security software and a firewall**

7. Data use

Personal data is of no value to Skcratch Enterprises Limited unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption, or theft:

- When working with personal data, employees should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be **encrypted before being transferred electronically**. The IT manager can explain how to send data to authorised external contacts.
- Personal data should **never be transferred outside of the European Economic Area**.
- Employees **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.

Skratch Enterprises Limited is part of Skcratch Corporation Limited Trading as Skcratch AV

Address: Unit 37/38 Ketley Business Park, Ketley, Telford, TF1 5JD

Contact Telephone Number: 01952 872360 Email: accounts@skratchav.com Website: www.skratchav.com

VAT Number: 834531633

Registration Number: 5050095



Technology
Provider
Gold 2020



8. Data accuracy

The law requires Skcratch Enterprises Limited to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Skcratch Enterprises Limited should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in **as few places as necessary**. Staff should not create any unnecessary additional data sets.
- Staff should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.
- Skcratch Enterprises Limited will make it **easy for data subjects to update the information** Skcratch Enterprises Limited holds about them. For instance, via the company website.
- Data should be **updated as inaccuracies are discovered**. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the marketing manager's responsibility to ensure **marketing databases are checked against industry suppression files** every six months.

9. Subject access requests

All individuals who are the subject of personal data held by Skcratch Enterprises Limited 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 how the company is **meeting its data protection obligations**.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the Managing Director, ianb@skcratchav.com. The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £10 per repeat or copy subject access request. The Director will aim to provide the relevant data within 30 days.

The Director will always verify the identity of anyone making a subject access request before handing over any information.

Skratch Enterprises Limited is part of Skcratch Corporation Limited Trading as Skcratch AV

Address: Unit 37/38 Ketley Business Park, Ketley, Telford, TF1 5JD

Contact Telephone Number: 01952 872360 Email: accounts@skcratchav.com Website: www.skcratchav.com

VAT Number: 834531633

Registration Number: 5050095



Technology
Provider
Gold 2020



10. Disclosing data for other reasons

In certain circumstances, the General Data Protection Regulations allow personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Skratch Enterprises Limited will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

11. Providing information

Skratch Enterprises Limited aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

Glossary

Term	Description
GDPR	General Data Protection Regulations

Document Control

Date	Version	Comments
04/03/2021	V1.2	Draft for comment – migrated to new template
11/03/2021	V1.2	Authorised and issued

Authorisation

Date	Version	Authorised By:
09/03/21	V1.2	Rebecca Walsh

Skratch Enterprises Limited is part of Skratch Corporation Limited Trading as Skratch AV
Address: Unit 37/38 Ketley Business Park, Ketley, Telford, TF1 5JD
Contact Telephone Number: 01952 872360 Email: accounts@skratchav.com Website: www.skratchav.com

VAT Number: 834531633

Registration Number: 5050095



Technology
Provider
Gold 2020



Employee Signature

I confirm that I have read and understand this policy.

Signed	
---------------	--

Skratch Enterprises Limited is part of Skratch Corporation Limited Trading as Skratch AV

Address: Unit 37/38 Ketley Business Park, Ketley, Telford, TF1 5JD

Contact Telephone Number: 01952 872360 Email: accounts@skratchav.com Website: www.skratchav.com

VAT Number: 834531633

Registration Number: 5050095