

# Aquaspersions Ltd Data Protection Compliance Statement

## About Aquaspersions Ltd

Aquaspersions Ltd is a manufacturer and supplier of aqueous dispersion products.

## Information Commissioners Office (ICO) Registration

Aquaspersions Ltd has registered with the Information Commissioners Office (ICO) under registration reference number **ZA553596**

## Our Commitment

Aquaspersions 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 recognise our obligations in updating and expanding this program to meet the demands of the GDPR.

Aquaspersions Ltd are dedicated to safeguarding the personal information and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of the Regulation. Our objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, Policies, Procedures, controls and measures to ensure maximum and ongoing compliance.

## How we are preparing to maintain GDPR compliance

Aquaspersions 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 1<sup>st</sup> January 2020. Our preparation includes:

### Information Audit

We will regularly carry 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. Data Protection Impact Assessments (DPIA) will have help us develop stringent procedures and assessment templates for carrying out impact assessment. We have implemented documentation processes that record each assessment, allow us to rate the risk posed by the processing activity and implement mitigating measures to reduce the risk posed to the data subject(s).

### Policies and Procedures

We have revised our data protection Policies and Procedures to meet the requirements and standards of the GDPR including data protection, IT security, data retention and erasure, data breaches and third party transfers and disclosures.

Aquaspersions Ltd have designated Neil Hickling as our Senior Information Risk Owner and we have prompted awareness of the GDPR across the Company, assessing our GDPR readiness, identifying any gap areas and implementing the new Policies, Procedures and measures.

Aquaspersions 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, induction and an annual training program. Staff will be given annual GDPR updates.

### Subject Access Request (SAR)

Aquaspersions Ltd has implemented the 30-day timeframe for responding to an SAR, providing the requested information and making this provision free of charge. Our new procedures detail how to verify the data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.

### Privacy Statement/Policy

Our Privacy Notice ensures 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.

### Data Transfer Statement

We have 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.

Aquaspersions Ltd may use data for specific purposes of statistical analysis and the promotion of our Company.

Aquaspersions Ltd will share personal information with law enforcement or other authorities if required by applicable law (in line with our Safeguarding Policy, where there are concerns about the safety or wellbeing of a child or adult at risk and it is considered necessary for their welfare and protection).

Aquaspersions Ltd will not share your personal information with any other third party without first obtaining your explicit consent.

### **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, in the office and during induction regarding an individual's right to access any personal information that Aquaspersions 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/inaccurate data 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

### **Right to be Forgotten/Subject Access Request**

We have a right to erasure process. If a Data Subject(s) wishes to have their data erased, Aquaspersions Ltd can be contacted via [n.hickling@aquaspersions.co.uk](mailto:n.hickling@aquaspersions.co.uk) or 01422 386200 for our Subject Access Request information.

**If you have any questions Aquaspersions Ltd Data Protection Policy and Procedure, please contact our Senior Information Risk Owner, Neil Hickling. Tel: 01422 386200 Email: [n.hickling@aquaspersions.co.uk](mailto:n.hickling@aquaspersions.co.uk)**

## **Information Security Measures (I.T.)**

Aquaspersions 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. Aquaspersions Ltd 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, including: - Record Access Sheets, access restricted folders, password protected data files and locked cabinets.

### **Encryption & Data Access**

Aquaspersions Ltd supports various encryption methods to protect the transition of data over both trusted and untrusted networks. Various technical security measures are also used including firewalls, VPNs, enterprise-grade antivirus, and auditable internet use. The organisation obtains destruction certificates when hard drives containing personal data are destroyed.

### **Backups (off-site)**

An automatic backup is taken of subjects' data every day and is held both locally and remotely within the same geographical region. Backups of subjects' data are retained for a minimum period of 1 year

after which time it is automatically destroyed, unless it is required, in line with our Data Retention Policy, to keep it for a longer period.

### **Managing vulnerabilities**

Aquaspersions Ltd tests to discover, investigate and fix vulnerabilities and performs regular vulnerability tests.

### **Access control (IT)**

Employees are required to sign Non-Disclosure Agreements (HR contract) upon joining Aquaspersions Ltd and are required to undertake annual training. Access to data is highly restricted and is governed by access rights approved by managers.

### **Decommissioning**

When a data storage device has reached the end of its useful life, Aquaspersions Ltd destroys data as part of a decommissioning process. All devices are destroyed in accordance with industry-standard practices.

### **Compliance certifications**

Third-party certifications and audits are an important component of any mature security program.

### **Password Policy**

A password policy requires staff to change passwords every 90 days. There are also rules about the complexity of passwords available in the Aquaspersions Ltd Data Protection Policy.

### **Forgotten username or password**

Aquaspersions Ltd has configurable built-in support to enable local administrators to enable and reset sub-user credentials and give limited access and exclusion to local staff and Trustees. Administrators can control number of users but administrator rights are maintained and secured by Microworld Ltd.

### **3<sup>rd</sup> Party Usage**

All data collected by Aquaspersions Ltd is consented to an anonymisation process in order for 3<sup>rd</sup> party statistical analysis. 3<sup>rd</sup> parties are mandated to provide their own signed Data Protection Compliance Statements and Privacy Policies.

## **Aquaspersions Ltd Privacy Statement**

Aquaspersions Ltd are committed to safeguarding the privacy of our website visitors. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

### **Disclosing personal information**

Aquaspersions Ltd may disclose your personal information to any of our employees insofar as reasonably necessary to the extent that we are required to do so by law, in connection with any ongoing or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

### **Retention**

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes to the extent that we are required to do so by law.

### **Cookies**

Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website. We use both session and persistent cookies on our website and Google Analytics to analyse the use of our website which generates statistical and other information about website use by means of cookies.

## **HUMAN RESOURCES**

### **HR records**

The ICO has issued an Employment Practices Code which Aquaspersions Ltd follows for (1) Recruitment and Selection (2) Employment Records (3) Monitoring at Work and (4) Information about Workers' Health.

The retention checklist is divided into two parts (1) statutory & (2) non-statutory with recommended retention periods followed to CIPD industry standards.

### **Office Security**

The Aquaspersions Ltd office is secured by locked doors, keypad and buzzer entrance, alarmed building, cctv cameras.

### **Access**

Access to the office is via self-locking door.

### **Office Maintenance**

The offices are maintained in house

### **Employment**

Employee files and the data within are kept in lockable cabinets at the Aquaspersions Ltd offices. They can only be accessed by the CEO, DCEO and Admin Manager who hold the sole keys for the cabinet.

### **Right to be Forgotten/Subject Access Request**

We have a right to erasure process. If you wish to be erased, or to withdraw processing consent, or delete/correct info then please contact please contact Aquaspersions Ltd via n.hickling@aquaspersions.co.uk or 01422 386200 for our Subject Access Request information.

### **Breach Notification**

We have a notification process in place for any breach. For further details on this, please contact Aquaspersions Ltd via n.hickling@aquaspersions.co.uk or 01422 386200 for our Breach Information and Procedures.