



GDPR Company Policy May 2018

Policy information	
Organisation	Romtech UK Ltd, 84 Alston Drive, Bradwell Abbey, Milton Keynes MK43 9HF Buckinghamshire
Data Controllers	Mr Pasquale Romeo (MD) Ms Natasha Woods (Credit Control)
Scope of policy	This policy applies to the place of business (See above) and offices to include working from home address. Mr Pasquale Romeo is sole Director and owner of Romtech UK Ltd. Both aforementioned data controllers (see above) are responsible for all data processing. Ms Natasha Woods is an employee of Mr Pasquale Romeo, who processes the data information on behalf and with consent of Mr Pasquale Romeo.
Policy operational date	22 nd May 2018
Policy prepared by	Ms Natasha Woods
Date approved by Board/ Management Committee	Mr Pasquale Romeo
Policy review date	To be reviewed 20 th May 2021

Introduction	
Purpose of policy	<ul style="list-style-type: none"> • To comply with the law • To follow good practice • To protect clients, staff and other individuals • To protect the organisation
Types of data	<ul style="list-style-type: none"> • Company Name and Delivery address • Email address and contact details • Telephone /Fax numbers
Policy statement	<ul style="list-style-type: none"> • Romtech UK Ltd has a commitment to comply with both the law and good practice • To respect individuals' rights • To be open and honest with individuals whose data is held • To provide training and support for staff who handle personal data, so that they can act confidently and consistently
Key risks	<ul style="list-style-type: none"> • information about data getting into the wrong hands, through poor security or inappropriate disclosure of information • individuals being harmed through data being inaccurate or insufficient • 3rd party companies attempting to trick staff into giving away information over the phone or by email.

Responsibilities	
Company Director	Mr Pasquale Romeo has overall responsibility for ensuring that the organisation complies with its legal obligations and requirements.
Data Protection Officer	Mr Pasquale Romeo and Ms Natasha Woods have overall responsibility for data protection, this includes: <ul style="list-style-type: none"> • Reviewing Data Protection and related policies. • Advising other staff on tricky Data Protection issues • Ensuring that staff are updated with Data Protection legislation and are aware of their role and responsibilities.
Employees	All staff are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Security	
Security measures	<ul style="list-style-type: none"> • Limited access, data controllers only. • Secure Password protection • Absolutely no contact details may be given to anyone over the phone without prior consent.
Specific risks	<ul style="list-style-type: none"> • Information worked on at home. • 3rd party companies attempting to trick staff into giving away information over the phone or by email

Data recording and storage	
Accuracy	Contact/ Invoicing information is regularly checked for accuracy with the individual/businesses concerned.
Updating	<p>There is a regular 6 monthly cycle of checking, updating and discarding old data.</p> <p>Discarded data is deleted from server, paper copies of any personal details is shredded immediately.</p>
Storage	Information held by Romtech UK Ltd is held on the main server. Paper documentation is held on file and stored safely with no access to anyone other than the data controllers.
Retention periods	Romtech UK Ltd reserves the right to hold on to information in relation to companies in order to continue to trade with the aforesaid companies. Once business links are severed details will be held for a further 6 months then destroyed if requested or archived within our company for 3 years.
Archiving	<p>The procedure for archiving or destroying data is</p> <ul style="list-style-type: none"> • Yearly archive of old invoices and documents, electronic and hard copy. • Once business links are severed, details will be held for a further 6 months then destroyed if requested, or archived within our company for 3 years.

Right of Access	
Responsibility	The data controllers Mr Pasquale Romeo and Ms Natasha Woods are responsible for ensuring that right of access requests are handled within the legal time limit which is currently one month.
Procedure for making request	Right of access requests must be put into writing. Employees are clear on their responsibility to pass on anything which might be an access request to the appropriate person/s without delay.
Provision for verifying identity	The person managing the access procedure who does not know the individual personally, should check/verify their identity, and reason for request before handing over any information. No personal information will be given to anyone without a legitimate reason for request and correct identification.
Procedure for granting access	<p>If the request is made to us electronically, we will provide the information via email once identification and validity of request determined.</p> <p>Postal requests will be dealt with via postal service once identification and validity of request determined.</p>

Transparency	
Commitment	<p>Romtech UK Ltd is committed to ensuring that all customers are aware that their data is being processed.</p> <ul style="list-style-type: none"> • for what purpose it is being processed • how to exercise their rights in relation to the data.
Procedure	<p>Romtech UK Ltd will inform customers old and new regarding data we hold about them and how we store this information via:</p> <ul style="list-style-type: none"> • occasional reminders in an email or newsletter • during the initial interview with potential customers • Data Protection Policy on the web site
Responsibility	The company Data controllers. Mr Pasquale Romeo and Ms Natasha Woods

Lawful Basis	
Underlying principles	Romtech UK Ltd needs to hold certain information about organisations/businesses in order to fulfil obligations regarding sales/and invoicing. Without any consent to retain certain information from individuals/organisations, may result in a barrier to continued business transactions
Opting out	Where Romtech UK Ltd is not relying on repeated consent from individuals/organisations; continued transactions imply consent where we provide goods and services. However, any request to opt out of data being used in particular ways will be addressed according to legal requirements.
Withdrawing consent	Romtech UK Ltd acknowledges that, once given, consent can be withdrawn at any time. Romtech UK Ltd cannot however, enter into a business relationship with an Individual/organisation without obtaining personal information and identifiers as this presents a barrier to trade. (GDPR Recital 40)

Employee training & Acceptance of responsibilities	
Induction	All employees who have access to any kind of personal data have their responsibilities outlined during their induction procedures. Staff are all aware of their role regarding data protection.
Continuing training	All Data Protection issues and topics are updated at team meetings where appropriate.

Policy review	
Responsibility	Mr Pasquale Romeo and Ms Natasha Woods
Procedure	Updates in new legislation will be applied at next review in May 2021 unless required by law to update and implement immediately. New updates will be available on Romtech UK Ltd website.
Timing	To be completed within timeframe of 3 years commencing April 2021