

Data Protection Policy

Last updated: 21st May 2018

1. Data protection principles

Haremi Ltd is committed to protecting the rights and freedoms of data subjects and safely and securely processing their data in accordance with its responsibilities under the General Data Protection Regulation (GDPR).

Haremi holds personal data about its employees, customers, suppliers and other individuals for the following purposes:

- Compliance with legal, regulatory and corporate governance obligation.
- Provision of services to our customers, such as product development and technical support.
- Operational reasons, such as processing transactions and quality control.
- Marketing our business.
- Recruitment and personnel management.

This policy sets out how Haremi seeks to protect personal data and forms the basis of data protection training for all employees.

As a data controller, Haremi has written contracts in place with any third party data processors that we use. The contract contains specific clauses which set out our and their liabilities, obligations and responsibilities. Haremi only appoints processors who can provide sufficient guarantees under GDPR that the rights of data subjects will be respected and protected.

As a data processor, Haremi only acts on the documented instructions of a controller. Haremi acknowledges its responsibilities as a data processor under GDPR and protects and respects the rights of data subjects.

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Haremi recognises that Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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; and
- f. 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.

2. General provisions

- a. Haremi's Data Protection Officer takes responsibility for the business's ongoing compliance with this policy.
- b. This policy is reviewed at least annually.
- c. Haremi is registered with the Information Commissioner's Office.

3. Lawful, fair and transparent processing

- a. Haremi ensures its processing of data is lawful, fair and transparent.
- b. Haremi maintains a data register of all systems or contexts in which personal data is processed by Haremi and the register is reviewed at least annually.
- c. Data subjects have the right to access their personal data (a subject access request) and Haremi deals with any such requests in a timely manner.

4. Lawful purposes

- a. Haremi ensures that all data is processed on one of the following lawful bases: **consent, contract, legal obligation, vital interests, public task or legitimate interests.**
- b. Haremi notes the appropriate lawful basis in its data register.
- c. Where consent is relied upon as a lawful basis for processing data, Haremi keeps evidence of opt-in consent with the personal data.
- d. Where communications are sent to a data subject based on their consent, the option for the data subject to revoke their consent will be clearly available and such revocation is reflected accurately in Haremi's systems.
- e. Haremi does not process personal data obtained for one purpose for any unconnected purpose unless the data subject concerned has agreed to this or would otherwise reasonably expect this.

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5. Data minimisation

- a. Haremi ensures that any data collected is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. Haremi takes reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up-to-date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Haremi's data register specifies data storage timescales and deletion processes.

8. Security

- a. Haremi ensures that personal data is stored securely using modern software that is kept-up-to-date.
- b. Haremi limits access to personal data to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this is done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions are in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data Haremi shall promptly assess the risk to the rights and freedoms of data subjects and if appropriate report this breach to the Information Commissioner's Office as soon as practically possible.

10. Data Protection Officer contact details

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