



COMPANY PROCEDURES

General Data Protection Regulations "GDPR" Policy

1 INTRODUCTION & SCOPE

1.1 Alexander Harley Seeds (Milnathort) Ltd needs to gather and use certain information about individuals.

1.2 These shall include:

- Customers
- Suppliers
- Business Contracts
- Other individuals the organisation has a relationship with or may need to contact.

1.3 Why this policy exists

This general data protection regulation ensures Alexander Harley Seeds (Milnathort) Ltd:

- Complies with the current general protection law and follow 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 or data breach

1.4 Data protection Law

The current regulation (EU) 2016/679 "GDPR" describes how organisations – including Alexander Harley Seeds (Milnathort) Ltd 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 the following important principles. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than necessary
- Processed in accordance with the rights of data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

2 PEOPLE, RISKS AND RESPONSIBILITIES

2.1 Policy Scope

This policy applies to:

- The head office of Alexander Harley Seeds (Milnathort) Ltd
- All staff of Alexander Harley Seeds (Milnathort) Ltd
- All contractors, suppliers and other individuals working on behalf of Alexander Harley Seeds (Milnathort) Ltd



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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 regulation "GDPR" this can include:

- Name of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Plus any other information relating to individuals

2.2 Data protection risks

This policy helps protect Alexander Harley Seeds (Milnathort) Ltd 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.

2.3 Responsibilities

Everyone who works for or with Alexander Harley Seeds (Milnathort) Ltd has some responsibility for ensuring data is Collected, stored and handled appropriately.

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

However, these people have key areas of responsibility:

- The Director is ultimately responsible for ensuring that Alexander Harley Seeds (Milnathort) Ltd meets its legal obligations.
- The data controller, is responsible for:
 - o Reviewing all data protection procedures and related policies, in line with the agreed schedule.
 - o Dealing with requests from individuals to see the data Alexander Harley Seeds (Milnathort) Ltd holds about them.
- The IT Company, Computer Support is responsible for:
 - o Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - o Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - o Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.

3. 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.
- Alexander Harley Seeds (Milnathort) Ltd will provide training to all employees to help them understand their responsibilities when handling data.



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- Employees should keep all data secure, by taking sensible precautions and follow 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 reviewed regularly and updated if it is found to be out of date. If no longer required, it should be deleted or disposed of safely.
- Employees should request help from their line manager or the data controller if they are unsure about any aspect of data protection.

3.1 Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT Company 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 room, drawer or filing cabinet.
- Employees should make 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.
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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 stored on removable media, these should be locked away securely when not being used.
- Data should only be stored on designated drives and servers, should only be uploaded to an approved cloud computing services.
- Servers containing personal data should be cited in a secure location.
- Data should be backed up frequently. Those backups should be tested regularly in line with the 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.

3.2 Data use

Personal data is of no value to Alexander Harley Seeds (Milnathort) Ltd 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 a form of communication is not secure.
- Data must be encrypted before being transferred electronically.
- Personal data should never be transferred outside of the European Economic area.
- Employers should not save copies of personal data to their own computers. Always access and update the central copy of any data.

3.3 Data accuracy

The law requires Alexander Harley Seeds (Milnathort) Ltd to take reasonable steps to ensure data is kept accurate and up to date.



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The more important it is that the personal data is accurate, the greater the effort Alexander Harley Seeds (Milnathort) Ltd 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 a 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 an employee's details when they call.
- Data should be updated as inaccuracies are discovered. For instance, if an employee can no longer be reached on their stored telephone number.

3.4 Subject access requests

All individuals who are the subject or personal data held by Alexander Harley Seeds (Milnathort) Ltd are entitled to:

- Ask what information the company holds for them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed of how the company is meeting the data protection obligations.

If an individual contact 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 data controller at info@harleys.co.uk. The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £10 per subject access request. The data controller will aim to provide the relevant information within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handling over any information.

3.4 Disclosing data for other reasons

In certain circumstances, the general data protection regulation allows personal data to be disclosed to law enforcement agencies without consent of the data subject.

Under these circumstances, Alexander Harley Seeds (Milnathort) Ltd 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.

3.5 Providing information

Alexander Harley Seeds (Milnathort) Ltd aims to ensure that individuals are aware that their data is being processed, and they understand that:

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