



HERTS CARS
BOREHAMWOOD

General Data Protection Policy

Policy information	
Data Controller	Herts Cars Borehamwood Ltd
Processors	Cordic Ltd Adelante Software Ltd
Policy operational date	15th May 2018
Policy prepared by	Imran Malik
Policy review date	15th May 2021

Introduction	
Purpose of policy	<ul style="list-style-type: none"> • complying with the law • registered with the ICO • following good practice • protecting clients, staff, drivers • protecting the organisation
Types of data	<ul style="list-style-type: none"> • name and telephone number • contact information including email address • demographic information such as postcode, preferences and interests • credit card information to make a booking which is encrypted when saved online and is PCI compliance. • Staff and Drivers details
Policy statement	<ul style="list-style-type: none"> • comply with both the law and good practice • respect individuals' rights • be open and honest with individuals whose data is held • provide training and support for staff who handle personal data, so that they can act confidently and consistently • Notify the Information Commissioner voluntarily, even if this is not required • Report any breaches to the ICO within 72 hours • Personal data breaches can include: <ul style="list-style-type: none"> • access by an unauthorised third party; • deliberate or accidental action (or inaction) by a controller or processor; • sending personal data to an incorrect recipient; • computing devices containing personal data being lost or stolen; • alteration of personal data without permission; and • loss of availability of personal data. • The Individual has rights for any information held
Key risks	<p>This should identify the main risks within your organisation in two key areas:</p> <ul style="list-style-type: none"> • Address and phone numbers passed on by operators • Credit Card fraud if taken by phone which is not allowed. • Drivers records misplaced or stolen

Responsibilities	
The Company Director	They have overall responsibility for ensuring that the organisation complies with its legal obligations.
Management	<p>Their responsibilities include:</p> <ul style="list-style-type: none"> • Briefing the Director on Data Protection responsibilities • Reviewing Data Protection and related policies • Advising other staff on tricky Data Protection issues • Ensuring that Data Protection induction and training takes place • Notification to the ICO • Handling subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Processors
Employees & Volunteers	All staff and volunteers 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.
Enforcement	The penalties for infringing the Data Protection and related policies is a sackable offence and could lead to prosecution. Training is provided to all Operators and Staff for the new GDPR requirements. A checklist guide is also provided.

Security	
Scope	Data Security is not wholly a Data Protection issue. Business Continuity is included below.
Setting security levels	The greater the consequences of a breach of confidentiality, the tighter the security should be.
Security measures	All our data is kept on our Cpaq Cordic System who are GDPR Compliance. All our credit card payments are processed by Adelante software Ltd. All our processes are PCI compliant. All our data cannot be downloaded our stored without administrator rights to whom only management have.
Business continuity	We have a daily backup of all our data which is stored on an external hard drive. This is taken offsite and is password protected.
Specific risks	<p>No access to our data dispatch system is made locally if working at home. The connection is made by remote access and information cannot be downloaded.</p> <p>All staff are aware of "vishing" and "phishing" where employees are tricked into giving away information over the phone or by email. Strict instructions are not to share any information and pass this risk onto management.</p>

Data recording and storage	
Accuracy	All information given over the phone by a customer for a booking is repeated back to them. Phone numbers are recognised by the system if used before and recent trips are stored. Checking drivers records are up to date.
Updating	All drivers records are checked monthly or if any changes then earlier. All account customer records are updated upon request.
Storage	All account customer, drivers and staff paper records are kept locked up in the management office. All data records are kept in a password protected folder.
Archiving	All old account customer, staff and driver paper records are shredded. All data records are deleted upon no usage. All data on our Cpaq system is stored for 3 months. This is then erased from our servers due to storage.

Right of Access	
Responsibility	The Management is responsible for ensuring that right of access requests are handled within the legal time limit which is one month.
Procedure for making request	Right of access requests must be in writing. They may require taking legal advice https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/
Provision for verifying identity	You will have to provide an official identification with your request or even come to our offices.
Charging	We will provide the information free of charge. However, we can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we will charge for all subsequent access requests. The fee will be based on the administrative cost of providing the information
Procedure for granting access	If the request is made electronically, we will provide the information in a commonly used electronic format.

Transparency	
Commitment	<ul style="list-style-type: none"> • We require this information to understand your needs and provide you with a better service, and for the following reasons: • Internal record keeping for recent trips • We may use the information internally to improve our products and services. • Any recorded recent trips are erased after 3 months • Keeping driver records to track insurance and licence
Procedure	<ul style="list-style-type: none"> • A handout for employees • News alert via staff emails and newsletters • Initial opening of account • Interview of a driver • on the web site
Responsibility	Management

Lawful Basis	
Underlying principles	<p>Consent - Processing data when booking a job is a must due to the need for the dispatching system to work.</p> <p>Contract - The information of a company or driver and staff is necessary for us to produce an agreement.</p> <p>Legal Obligation - for us to comply with the law</p>
Opting out	Our cpaq dispatching system needs information like your telephone number address for us to provide you with an efficient service. You have the option to withhold your telephone number if you wish. We may send you emails regarding the booking made by you, which you can also request to opt out if you wish.
Withdrawing consent	You can withdraw you consent on receiving emails or us storing you details at any time. The recent trips are stored up to 3 months in our systems. You can do this by sending is a written email stating this.

Employee training & Acceptance of responsibilities	
Induction	All employees who have access to any kind of personal data are briefed and trained on handling personal data and the importance of this. This is also repeated twice a year.
Continuing training	Any updates on data protection and questions raised by the staff are dealt with staff letters and our internal mail system.
Procedure for staff signifying acceptance of policy	All staff will sign an acceptance of understanding of the GDPR Policy handout.

Policy review	
Responsibility	Imran Malik – Business Manager
Procedure	Consultation of the review will be also briefed to all operators, controllers, managers and the director.
Timing	15 th May 2021 or earlier if updates are to be made