

# Table Of Contents

<b>Table Of Contents</b>	<b>1</b>
<b>Who we are and how you can contact us</b>	<b>2</b>
How to Contact us	2
<b>When we need your consent to use your personal data</b>	<b>2</b>
Personal data you are legally obliged to provide	2
<b>Data protection policy</b>	<b>3</b>
<b>Context and overview</b>	<b>3</b>
Key details	3
<b>Introduction</b>	<b>3</b>
<b>Why this policy exists</b>	<b>3</b>
<b>Data protection law</b>	<b>3</b>
<b>People, risks and responsibilities</b>	<b>4</b>
Policy scope	4
Data protection risks	4
Responsibilities	4
General staff guidelines	4
Data storage	5
Data use	6
What we collect	6
What we do with the information we gather	6
<b>Data accuracy</b>	<b>6</b>
<b>Disclosing data</b>	<b>7</b>
Subject access requests	7
Other reasons	7
<b>How you can make a complaint</b>	<b>7</b>
<b>How long we keep your personal data</b>	<b>7</b>
<b>Providing information</b>	<b>7</b>
<b>How we keep this policy up to date</b>	<b>8</b>

## Who we are and how you can contact us

We are Manor Monumental Company Ltd, a Limited Company Registered, 14 Feb 2003, in England and Wales under company No. 04667044

### How to Contact us

In writing to 281a Cherry Lane, L4 8SA.  
By email [office@manormonumental.com](mailto:office@manormonumental.com)  
By Telephone +44 (0)151 226 2346  
By Fax +44 (0)151 226 8384

## When we need your consent to use your personal data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

We are entering into and carrying out our obligations under a contract with you

We need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights.

### Personal data you are legally obliged to provide

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data we may be unable to provide our products or services to you.

Your rights to know what personal data we hold and to control how we use it

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time. Please mark your letter "Subject Access Request" and send it to us by post or email using the details in the "Who we are and how you can contact us" section.

### *Your Rights*

You have the right to:

- Prevent your personal data being used for marketing purposes (see "How we use your personal data for marketing" for further details)
- Have inaccurate personal data corrected, blocked or erased
- Object to decisions being made about you by automated means or to your personal data being used for profiling purposes (see "Automated decision making and profiling")
- Object to our using your personal data in ways that are likely to cause you damage or distress;
- Restrict our use of your personal data
- Require that we delete your personal data
- Require that we provide you, or anyone that you nominate, with a copy of any personal data you have given us in a structured electronic form such as a CSV file.

You can find full details of your personal data rights and the circumstances in which you are able to exercise them on the Information Commissioner's Office website at [www.ico.org.uk](http://www.ico.org.uk).

### *Automated decision making and profiling*

We do not make use of automated decision making or profiling.

You are entitled to ask that we do not make automated decisions about you or use your personal data for profiling purposes.

### *When we will share your personal data with others*

We do not share your personal data with others

# Data protection policy

## Context and overview

### Key details

Policy prepared by:	Duane Buttle
Approved by board / management on:	23.05.18
Policy became operational on:	23.05.18
Next review date:	23.05.19

## Introduction

Manor Monumental Company Ltd needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this data must be:

- Collected
- Handled
- Stored

In both electronic & physical forms in order to meet the company's data protection standards and to comply with the law; as set down by the General Data Protection Regulation (GDPR).

## Why this policy exists

This data protection policy ensures Manor Monumental Company Ltd:

- Complies with data protection law and follows 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 of a data breach

## Data protection law

The Guide to the General Data Protection (GDPR) describes how organisations, including Manor Monumental Company Ltd, must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The GDPR is underpinned by these important principles that say personal data must:

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

## People, risks and responsibilities

### Policy scope

This policy applies to:

- The head office of Manor Monumental Company Ltd
- All branches of Manor Monumental Company Ltd
- All staff and volunteers of Manor Monumental Company Ltd
- All contractors, suppliers and other people working on behalf of Manor Monumental Company Ltd
- All data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR.

This can include, but not be limited to:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- ...plus any other information relating to individuals

### Data protection risks

This policy helps to protect Manor Monumental Company 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.

### Responsibilities

Everyone who works for or with Manor Monumental Company Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

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

However, the key areas of responsibility for the **business owner (Dave Hollywood)** is ultimately responsible for ensuring that Manor Monumental Company Ltd meets its legal obligations and is also the **data protection officer, IT Manager** and **Marketing Manager** is responsible for:

- ✓ Keeping updated about data protection responsibilities, risks and issues.
- ✓ Reviewing all data protection procedures and related policies, in line with an agreed schedule.
- ✓ Arranging data protection training and advice for the people covered by this policy.
- ✓ Handling data protection questions from staff and anyone else covered by this policy.
- ✓ Dealing with requests from individuals to see the data Manor Monumental Company Ltd holds about them (also called 'subject access requests').
- ✓ Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- ✓ Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- ✓ Performing regular checks and scans to ensure security hardware and software is functioning properly.
- ✓ Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- ✓ Approving any data protection statements attached to communications such as emails and letters.
- ✓ Addressing any data protection queries from journalists or media outlets like newspapers.
- ✓ Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

### 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.
- **Manor Monumental Company Ltd will provide training** to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following 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 **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees **should request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection.

## Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager 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 drawer or filing cabinet**.
- Employees should make sure 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.

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 is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's 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**.

## Data use

Personal data is of no value to Manor Monumental Company Ltd unless it can be used by the business. 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 this form of communication is not secure.
- Data must be **encrypted before being transferred electronically**.
  - The IT manager can explain how to send data to authorised external contacts.
- Personal data should **never be transferred outside of the European Economic Area**.
- Employees **should not save copies of personal data to their own computers**.

Always access and update the central copy of any data.

## What we collect

We may collect the following information:

- Name
- Contact information which may include an email address
- Demographic information such as postcode, preferences and interests

## What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping and Job Control.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

## Data accuracy

The law requires Manor Monumental Company Ltd to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Manor Monumental Company 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 **as 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 a customer's details when they call.
- Manor Monumental Company Ltd will make it **easy for data subjects to update the information** Manor Monumental Company Ltd holds about them.
- For instance, via the e-mail.
- Data should be **updated as inaccuracies are discovered**. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the marketing manager's responsibility to ensure **marketing databases are checked against industry suppression files** every six months.

## Disclosing data

### Subject access requests

All individuals who are the subject of personal data held by Manor Monumental Company Ltd are entitled to:

- Ask **what information** the company holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the company is **meeting its data protection obligations**.
- If an individual contacts 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 [office@manormonumental.com](mailto:office@manormonumental.com) . 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 data within 14 days.
- The data controller will always verify the identity of anyone making a subject access request before handing over any information.

### Other reasons

In certain circumstances, the Data Protection Act/GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Manor Monumental Company 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.

### How you can make a complaint

If you are unhappy with the way we have used your personal data please contact us to discuss this using the contact details set out in the "Who we are and how to contact us" section of this policy.

You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting [www.ico.org.uk](http://www.ico.org.uk). Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

### How long we keep your personal data

We only keep your personal data for as long as we actually need it. In practice this means that we will keep your personal data for as long as you are a customer or for so long as we need to retain your personal data so that we continue to provide you with services you have requested from us, comply with our legal obligations, resolve disputes or enforce agreements.

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

### Providing information

Manor Monumental Company Ltd aims to ensure individuals understand:

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

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company. This is available on request. A version of this statement is also available on the company's website:

[www.manormonumental.com/privacy.pdf](http://www.manormonumental.com/privacy.pdf)

## How we keep this policy up to date

We will review and update this policy from time to time. This may be to reflect a change in the products or services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website

[www.manormonumental.com](http://www.manormonumental.com)

Each time we update our policy we will update the policy version number shown on the cover page of the policy and the date on which that version of the policy came into force.