



**WIDMER LTD**  
ESCOMATIC SERVICE

# Data Protection Policy

## Widmer Limited



## Confidentiality Statement

This policy contains information confidential and proprietary to Widmer Limited. This document contains information that is confidential or otherwise protected from disclosure and shall not be disclosed without prior approval.

## Document version control

The document owner is the Director.

Date	Current Version	Comment	Next review date	Author	Status
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## Contacts

Company	Contact
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## Definitions

The definition of the Data Controller, Data Processor, Data, Personal Data, Data Subject, Processing is in accordance with the Data Protection Act 2018 subsequent amendments and the UK GDPR (“the General Data Protection Regulation”), where applicable the EU GDPR.

“**DPIA**” means “Data Protection Impact Assessment under the UK GDPR.

“**DPO**” means the data protection officer.

“**ICO**” means the information commissioner’s office referred to as the Commissioner.

## 1. Introduction

This policy provides a guidance to the Widmer Limited commitment to taking data privacy seriously for all electronic and manual processing of Personal Data along with respecting Data Subject Rights in accordance with Our privacy policy. This policy applies to all employees, contractors and third parties across the business.

## 2. Principles of Personal Data

Everyone shall ensure that Personal Data in accordance with Article 5 of the UK GDPR is: -

1. Processed lawfully, fairly and in a transparent manner;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
3. Adequate, relevant and limited to what is necessary;
4. Accurate and, where necessary, kept up to date;
5. Kept no longer than is necessary for the purposes for which the Personal Data are processed;
6. Processed in a manner that ensures appropriate security of the Personal Data.

## 3. Lawfulness of processing

The Widmer Limited, will align its processing activities to the appropriate legal basis under Article 6 of consent, contract, legal obligation, vital interests, public task or legitimate interests.

## 4. Data minimisation

The Widmer Limited, will ensure in accordance with Article 5(1)(c) of the UK GDPR that Personal Data: -



(a) is adequate to fulfil the purpose. If it is not helpful to the purpose, then it is inadequate;

(b) is relevant to link the purpose;

(c) is limited to what is necessary this limited to what is required for the purpose.

## **5. Data Protection Impact Assessment (DPIA)**

The Data Controller shall carry out the DPIA prior to any processing taking place in accordance with Article 35 and 36 of the UK GDPR. Any impact assessment may use any existing templates which are available. This impact assessment process will be: -

- (a) Ask is it a major project or is there a high risk to Personal Data;
- (b) Asses the nature and the scope along with the purpose;
- (c) Consider the risk and measures to mitigate the risk;
- (d) Where required consultation with individuals or ICO;
- (e) obtain stakeholder sign off including DPO, technical, legal etc;

## **6. Right to erasure or right to be forgotten**

This process is to be followed for Data Subjects right to erasure: -

1. The Data Controller is responsible for ensuring that erasure requests are dealt with. Unless exception of health, freedom of information, archiving or any other apply then erasure will not proceed;
2. Keep a record of each deletion request;
3. If you refuse erasure request you must (a) justify reason for not taking action (b) give them the right to complain to ICO (iii) option to seek alternative judicial remedy;
4. The erasure request will dependant on whether the Personal Data is no longer required, consent is withdrawn, unlawfully processed or the Data Subject objects;
5. Inform other organisations e.g. if Personal Data is disclosed to others or made public in online environments;
6. Check with the Data Controller and Our customers etc that they have also erased the Data Subject Personal Data from any storage or any backups. This also includes erasure of any Personal Data that has been in the public domain including any copies, links or replications related to Our services only.



## **7. Retention of Personal Data**

This shall be in accordance with Our retention policy.

## **8. Data breach investigation**

This shall be in accordance with Our data breach policy.

## **9. Privacy policy**

Our privacy policy contains Data Subject Rights, Data Controller, Data Processor, third parties, Data Subject Requests and outside EEA transfers.

## **10. Registration with the ICO**

Where applicable Widmer Limited, if it is required to register shall register with the ICO that processes Personal Data.

## **11. Training**

The Widmer Limited, will provide their staff and contractors adequate training on data protection laws and processing of Personal Data and where applicable any refresher training.

## **12. Compliance manager contact**

The compliance manager who is responsible for overseeing that this policy and Personal Data along with data privacy matter is the Director.