

Orchascan Trading as Secure-Scanning - Privacy Statement/Policy

1. Introduction

1.1 This policy confirms our commitment to complying with UK Data Protection Law and the General Data Protection Regulation (GDPR).

2. Personal Data

2.2 Personal data is information (including opinions), which relates to an individual and from which he or she can be identified, either directly or indirectly through other data, which the Company has or is likely to have in its possession. Individuals are referred to as data subjects.

3. Our Responsibilities

3.1 Orchascan Trading as Secure-Scanning is a Data Controller and we also carry out data processing on behalf of our clients. As such, we are responsible for ensuring our systems, our processes and our suppliers comply with UK Data Protection Law and the General Data Protection Regulation (GDPR).

4. Data Protection Principals

4.1 When processing personal data we fully comply with the data protection principals, as follows:

- We process personal data fairly, lawfully and transparently
- We collect personal data for specific, explicit and legitimate purposes
- We ensure the personal data processed is adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed
 - We ensure any personal data processed, is accurate and where it is established that personal data is inaccurate, we erase or rectify the data without delay
 - We keep personal data for only as long as is necessary
 - We process personal data securely

5. Collection, Use and Disclosure

5.1 As a Company, we keep and maintain a register of all personal data we collect and process and record the type of data held, the data source, the data subject, the legal basis and business reasons for processing the data, where the data is held, any recipients of the data, how long the data is held and how the data is kept secure.

5.2 Type of Data

5.2.1 As a Company, the personal data we collect and process falls into one of the following categories:

- Personal data relating to subscribers to our online News Letter

- Personal data relating to our clients and prospective clients
- Personal data obtained and created in relation to providing a service to our clients, i.e. our client's employees data
- Personal data relating to our suppliers who support us in providing a service to our clients
- Personal data relating to our employees

5.3 Data Sources

The data we hold, as described above, is provided to us by prospective clients, and others who are interested in our electronic newsletters, by clients, by suppliers and from our employees.

5.4 The Legal Bases and Business Reasons for Processing Data

5.4.1 We process the personal data as described above for the following legal bases and business reasons:

- To provide Document Archiving solutions to our clients in accordance with agreements which exist between us
- To liaise as appropriate, with our suppliers in accordance with contracts which exist between us
- For the performance of the Contract of Employment with our employees

5.5 Recipients of Data

5.5.1 Only where necessary, in relation to the purpose for which it is processed, we will share personal data with:

- Sub-contractors / an alternate appointed by us in accordance with the relevant Contract
- Suppliers in accordance with the relevant Contract

5.6 Retention of Personal Data

5.6.1 Our retention periods are regularly reviewed in line with the Data Protection Principles outlined above:

- We retain personal data relating to subscribers to our electronic newsletters whilst there is an on-going authentic business relationship in existence, or until they unsubscribe from our electronic newsletters.
- We retain personal data relating to our clients for the duration of the Contract only
- We retain personal data relating to prospective clients for 6 months only
- We retain personal data obtained and created in relation to providing a service to

our clients for the duration of the Contract or for 6 months, whichever is most applicable

- We retain personal data relating to our suppliers who support us in providing a service to our clients for the duration of the Contract only or for 6 months, whichever is most applicable

- We retain personal data relating to our employees for specific retention periods only,

5.6.2 We will review our computerised and manual records each month, to ensure that all personal data is retained in line with the retention periods specified above.

5.7 Security

5.7.1 Due to the nature and confidentiality of the work, which we carry out, we take security seriously and hold personal data, only for as long as is necessary, as detailed within in our register, in:

- In a secure access only area with a secure building and
- Encrypted, firewall protected, password protected (which are changed regularly) computers and storage devices

5.7.3 We destroy via shredding, any manually held personal data, which is no longer required.

5.8 Transfer of Personal Data outside of EU

5.8.1 We process personal data in the UK only.

5.9 Withdrawal of Consent

Where you have consented to our processing of your personal data, you have the right to withdraw that consent at any time. Please inform us immediately, if you wish to withdraw your consent. Please note, the withdrawal of consent does not affect the lawfulness of earlier processing. If you withdraw your consent, we may not be able to continue to provide services to you. Even if you withdraw your consent, it may remain necessary for us to process your data for a specific legal basis.

5.10 Automated decision-making

5.10.1 We do not intend to use automated decision-making in relation to your personal data.

6. Individuals Rights in respect of Processing of Personal Data:

6.1 Requesting Personal Data (Subject Access Request)

6.1.1 You have a right to request access to your personal data that we hold. Such a request is known as a 'Subject Access Requests'. A SAR should be made in writing and include:

- your name and/or any other names (s) you have used

- your date of birth
- your previous addresses in the past five years
- what type of information you want to know
- the back page of your passport or a copy of your driving licence
- a recent utility bill

6.1.2 We will comply with your request in a timely manner and within one month of receipt. There may be, however, some circumstances in which the law allows us to refuse to provide access to personal data in response to a SAR (e.g. if you have previously made a similar request and there has been little or no change to the data since we complied with the original request). We will not charge you for dealing with a SAR.

6.1.3 You can ask someone else to request information on your behalf – for example, a friend, relative or solicitor. We must have your authority to respond to a SAR made on your behalf. You can provide such authority by signing a letter, which states that you authorise the person concerned to write to us for information about you, and/or receive our reply.

6.2 The Right to Rectification

6.2.1 You have a right to obtain the rectification of any inaccurate personal data concerning you that we hold. You also have a right to have any incomplete personal data that we hold about you completed. Should you become aware that any personal data that we hold about you is inaccurate and/or incomplete, please inform us immediately so we can correct and/or complete it.

6.3 The Right to Erasure

6.3.1 In certain circumstances you have a right to have the personal data that we hold about you erased. Further information is available on the ICO website (www.ico.org.uk). If you would like your personal data to be erased, please inform us immediately and we will consider your request. In certain circumstances we have the right to refuse to comply with a request for erasure. If applicable, we will supply you with the reasons for refusing your request.

6.4 The right to Restrict Processing and the Right to Object

6.4.1 In certain circumstances you have the right to ‘block’ or suppress the processing of personal data or to object to the processing of that information. Further information is available on the ICO website (www.ico.org.uk). Please inform us immediately if you want us to cease to process your information or you object to processing so that we can consider what action, if any, is appropriate.

6.5 The Right to Data Portability

6.5.1 In certain circumstances you have the right to be provided with the personal data that we hold about you in a machine-readable format, e.g. so that the data can easily be provided to a new professional adviser. Further information is available on the ICO website (www.ico.org.uk).

6.6 The Right to With Consent

6.6.1 Where you have consented to our processing of your personal data, you have the right to withdraw that consent at any time. Please inform us immediately if you wish to withdraw your consent.

7. Complaints

7.1 If you have requested details of the information we hold about you and you are not happy with our response, or you think we have not complied with UK Data Protection Law and the General Data Protection Regulation (GDPR) in some other way, you can complain to us. If you are not happy with our response, you have a right to lodge a complaint with

the ICO (www.ico.org.uk).

8. Contact Details

8.1 Warren Orchard, Managing Director. Orhascan Trading as Secure-Scanning
Orhascan Limited Office 10, Hanley Farm Business Park, Tidenham, Chepstow,
NP16 7NA