

The First Mailing Ltd

Data Security & Privacy Policy

First Mailing are committed to protecting the personal data we are provided with by our clients and the customer database that we hold. We follow strict security procedures to ensure we are compliant with both the Data Protection Act and GDPR. The following policy sets out how we receive data, how we keep data safe, where the data comes from, how and why we use it, how it's stored, and why it may need to be shared.

Data Security

To comply with GDPR we have taken steps to ensure all of our IT systems, firewall protection, antivirus software needed for the storage and transfer of data are robust and fit for purpose and meet acceptable industry security standards.

We perform regular third party penetrative checks on our system hardware to ensure it is functioning effectively. We take multiple measures to back up data appropriately.

Day to day access is limited to authorised computer users and transfers of data are monitored, password protected and encrypted. We do not allow mobile devices or cameras to be used within our processing areas.

All access points within the building are covered by CCTV as a deterrent but also for monitoring.

All waste products are securely destroyed or recycled.

All data the company utilises will be verified as GDPR compliant and we will seek to ensure data consent has been actively provided by the data subject. We will comply with data access requests via email.

We do not sell data. We will only share data at the express request of the data controller in writing.

As a Data Controller

Our database of B2B contacts is used to promote our services. We collect this data to enable us to promote our services to a wider audience of potential contacts to whom our services are relevant. This data is gathered via show attendees and contacts, business networking, customers and those companies having requested information or quotations from us. **We do not cold call contacts. We do not cold e-mail prospects.**

Direct Mail is the method of contact we use as a business. When we communicate with the data subjects we always provide a clear method of opting out of further communication which is available via:

optout@firstmailing.co.uk

As a Data Processor and Sub processor

We receive a mixture of B2B and B2C data from a variety of contracted data controllers and processors, who ask us to process their data for the purposes of marketing and promotion. The data is sorted to gain the best postal rates by ourselves or third party postal operators, all of whom have signed our Data Sharing and Non-Disclosure Agreement and comply with GDPR.

The data provided must be GDPR complaint with adequate proof of consent for use by the recipient, previously provided in writing. We will provide a clear and transparent reasoning for processing data when asked to do so, as each project may differ.

We only use the data provided for the specific task requested by the data controller/processor and hold the data for the limited time period of the work undertaken after which we delete the data and provide a destruction certificate. Data must be transferred via our portal which provides military grade encryption

Data Sharing

We will only share data when advised to do so by the data controller. Our Data Controller and Data Processing Agreement, declares why and when we would need to do this. Any sharing is via a secure method using encrypted files. All files are deleted after use. At no point do we take ownership of any client data. The responsibility for its upkeep, relevance and compliance remains with the controller.

Standard Information held is usually Name, Address, Tel No, Email address, membership numbers, customer numbers. Occasionally we are provided with information which is more sensitive.

We give a clear method of opting out of communications from our company and additionally provide a clear method for an individual to ask for a subject access request or SAR from subjectaccessrequest@firstmailing.co.uk which requires us to provide a note of the data we hold on someone and what we use it for.

At no point do we sell or share data unless specifically requested to do so by the data controller in accordance with our terms and conditions, a copy of which is available on request.

General

All staff and employees are trained in data protection awareness and GDPR basic principles. Detailed procedures are in place that all employees must understand and comply with. We do not share or provide data to any location outside of the EEA.

In order that we can promptly identify a data breach we have trained all employees to ensure any element of concern is raised. This may result in the reporting of a breach depending on its severity and the sensitivity of the data concerned.

Procedures are clear as to how we manage waste materials produced during a project. These procedures include the secure shredding of all paper waste prior to recycling and the secure recycling of polythene.

Date of Implementation

18th May 2018

Review date

1st January 2019