# Big Web Warehouse Ltd
# Data Protection Policy Statement 2023

## Purpose of this statement of policy

To ensure all employees and stakeholders apply appropriate measures to comply with the principles of the Data Protection Act 1998, summarised below, and so meet the Company's statutory requirements and mitigate against penalties applied under the Act either for the company or its customers.

Personal information (data relating to a living individual) -

1. must be processed data fairly and lawfully
2. must be obtained for one or more specific and lawful purposes and only processed in a manner compatible with them
3. must be adequate, relevant and not excessive for the purposes defined
4. must be accurate and where necessary kept up to date and shall not be kept for longer than is necessary
5. must be processed in accordance with the data subject's rights
6. must be kept secure
7. must not be transferred outside the European Economic Area unless there is adequate protection for the rights of data subjects

## Scope

All departments of the Company and its associated companies

## Policy Statement

Big Web Warehouse Ltd regards the lawful and correct treatment of personal information as very important to successful operations and to maintaining the confidence of those with whom we deal. We will always do our utmost to ensure that our organisation treats personal information lawfully and correctly. Big Web Warehouse stores archive material on behalf of clients. The client holds databases which are only disclosed to Big Web Warehouse if chosen to do so. The material held in secure archive storage is requested by the client by computerised bar coding of a specific box and cross reference to the nature of the content is not required by the supplier to operate the service. To this end we fully endorse and adhere to the Principles of Data Protection as enumerated in the Data Protection Act 1998.

## Specific Responsibilities

There will be a Policy Officer (Information) who will:

- Maintain a register of personal records and arrange for the Company's notification with the Information Commissioner's Office. (JL)
- Monitor and report on the processing of Subject Access Requests within the company.
- Audit the Company's compliance with this policy and report to the SM Team on whether the objectives are met.
- Inform affected clients in the event of any breach of data within 24 Hours of breach being reported.

It will be the responsibility of each Manager to:

- Ensure their Department's compliance with the Data Protection Act and implement agreed work and training programmes for Data Protection
- Arrange for Subject Access Requests to be carried out within their Directorate
- Arrange with Administration manager to ensure data protection training is included at induction and that training is maintained through Bright HR System.
- Identify and record information asset owners who keep personal data within their Department
- Disseminate guidance to information asset owners within their Department
- Ensure that information asset owners are trained in the principles of the Act and the procedures for their implementation within the Company.
- Undertake other Data Protection tasks assigned by the Policy Officer (Information).
- Police this policy

It will be the responsibility of each information asset owner to:

- Inform their Department's line manager and the Policy Officer (Information) of existing records and proposals to process personal information for the register.
- Ensure that they receive training on the Data Protection Act (though Bright HR System)
- Ensure that the data custodians assigned to their datasets are made aware of the standards applicable to their datasets and monitor their adherence.

As data custodians, it is everyone's responsibility to:

- Ensure any specific responsibilities for Data Protection are recorded in their role profile.
- Understand and implement Data Protection Principles.

## Review

The Policy Officer (Information) will record Subject Access Requests and any complaints in respect of the Act, and will report to Senior Management Team any recommendations for changes to the policy.