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**Privacy Policy (GDPR)**

**Introduction**

With the introduction of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) on 25th May 2018, we have revised our terms relating to how we collect, use, share and protect personal data from our employees, applicants, suppliers, customers, business contacts and other people the company has a relationship with or may need to contact.

World of Spice is required to gather and process relevant personal data regarding individuals.

This policy describes how this personal data must be collected, handled and stored to meet the company’s data protection standards and comply with the GDPR.

**What is GDPR?**

The European Union (EU) has enacted a new set of laws entitled the General Data Protection Regulation (GDPR). These laws went into effect on 25th May 2018.

Under the GDPR, EU citizens have the right to choose how their personal data is used and stored. The GDPR is replacing the EU Data Protection Directive, with stricter rules on how a business should handle customer’s personal information.

The GDPR describes how organisations, including World of Spice Ltd, must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or by any other means.

**GDPR compliance**

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

The GDPR is underpinned by six important principles. These say the personal data must be:

* Processed lawfully, fairly and in a transparent manner
* Obtained for specified, explicit and legitimate purposes
* Adequate, relevant and limited to what is necessary
* Accurate and, where necessary, kept up to date
* Retained only for as long as necessary
* Processed in an appropriate manner to maintain security

**Why this policy exists?**

The GDPR ensures that World of Spice Ltd:

* Complies with GDPR and follow good practice
* Protects the right of staff, customers and partners
* Is open about how it stores and processes individuals’ data
* Protects itself from data breach.

**Scope**

This policy applies to all staff, contractors, suppliers and other people working on behalf of World of Spice ltd. It applies to all data that the company holds to identifiable individuals (personal data).

Personal data covers both facts and opinions about an individual where that data identifies an individual. This includes:

* Names of individuals
* Postal addresses
* Email addresses
* Telephone numbers
* Plus, any other information relating to individuals.

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**Data protection risks**

This policy helps to protect World of Spice Ltd. from some very real data security risks, including:

* Breaches of confidentiality – i.e information being given out inappropriately
* Failing to offer choice – i.e. the individuals should be free to choose how the company uses data relating to them
* Reputational damage – i.e. the company could suffer if hackers successfully gained access to personal data.

**Responsibilities**

Everyone who works at World of Spice Ltd. has some responsibility for ensuring data is collected, stored and handled appropriately.

Each person that handles personal data must ensure that it is handled and processed in line with this policy and GDPR principals however, the Directors have key areas of responsibility.

* The Directors are responsible for ensuring that World of Spice Ltd. meets its legal obligations in regards to:
	+ Reviewing data protection procedures and policies
	+ Providing or arranging staff awareness, training and guidance where necessary
	+ Dealing with subject access requests (requests from individuals to see the data World of Spice holds about them)
	+ Management of the company IT system maintenance and security
	+ Approval of data protection statements attached to emails
	+ Addressing data protection queries from journalists or media outlets
	+ Ensuring marketing databases are checked regularly
	+ 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 Manager.
* Employees should keep all data secure by taking sensible precautions and following the guidelines below.
* Strong passwords must be used and not shared
* Personal data should not be disclosed to unauthorised people, either within the company or externally
* Data should be regularly reviewed and updated if found to be out of date
* Data no longer required should be deleted and disposed of
* Employees should request help from their Manager if they are unsure about any aspect of data protection

**Data Storage**

When data is stored on paper, it should be:

* Kept in a secure place where unauthorised people cannot see it
* Shredded and disposed of when no longer required.

When data is stored electronically, it should be:

* Protected by strong passwords that are changed regularly and not shared
* When stored on removeable media, kept in a secure place when not being used
* Only stored on designated devices and servers
* Backed-up frequently

All servers and computers containing data should be protected by approved security software and firewall.

**Data use**

Personal data is of no value to World of Spice Ltd. unless the business can make use of it. 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 they keep it secure and inaccessible to unauthorised people
* Personal data should not be shared informally
* Employees should not save copies of personal data to their personal computers.

**Data accuracy**

The law requires World of Spice ltd. to take reasonable steps to ensure data accurate and up to date.

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 should be held in as few places as necessary
* Staff should take the opportunity to ensure data is updated e.g. confirming a customer’s details when they call.
* Data should be updated as soon as inaccuracies are discovered.

**Subject access requests**

Customers, suppliers and employees can contact us directly if they have any question about our privacy notice or information we hold about them, or if they wish to exercise any of their rights or to object to our use of their personal data information.

To do so, they will have to write us at the address given below:

World of Spice Ltd.

Unit 22 Bebington Close

Billericay

CM12 0DT

Email address: mark@worldofspice.co.uk

We will comply with the request within one month, but wherever possible we will handle requests without delay.

In certain circumstances, personal data can be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, World of Spice Ltd. will disclose requested data. However, the Director(s) will ensure the request is legitimate, seeking assistance from the company’s legal advisors where necessary.

Signed  Date: 08/06/2020

Director/General Manager: M. Rothon