



# Data processing and protection policy

## Introduction

At Cheryl Pet Portraits, I need to collect, process, secure and use personal data to market, produce and send my pet portraits.

This policy outlines the broad general data protection regulations and principles with which I must comply. The policy identifies the data that the I need to hold, why this data is held, how long it is kept for and explains how it is processed.

This policy will be made readily available to everyone via my website so that they are able to understand and have confidence in the way that their personal data is processed.

## Contents

1. Types of data collected and the source	2
2. How the data is processed for specific purposes, including how consent:	
2.1 Marketing to potential customers	3
2.2 Customer details	4
3. Procedure for responding to subject access requests	5
4. Procedure for deletion of records	5
5. How data protection is designed into systems	5
5.1 Computer security	5
6. Procedure for dealing with a data breach	5



## 1. Types of data collected and the source

To operate effectively, I need to collect, process and store several types of data from a variety of different sources. Within my operations, I will collect professional and personal data and information for:

- Suppliers
- Customers
- Potential customers

Specific data will be collected to enable me to source materials, market, produce and deliver my service. The specific data that will be collected:

	<b>How and when data collected</b>	<b>What information collected</b>	<b>How will the information be used</b>
<b>Suppliers</b>	- When purchasing supplies	- Supplier name - Website - Contact email - Telephone number	- Added to supplier list - Details added to accounting software
<b>Potential customers</b>	- Via connection on social media - Email enquiry	- Social media contact - Name - Email address	- Name and email address added to marketing list - Contact added to social media
<b>Customers</b>	- Commission of pet portrait	- Name - Pet name - Email address - Postal address	- Customer invoice and receipt - Name and email address added to marketing list -



## 2. How the data is processed for specific purposes, including how consent is given

### 2.1 Marketing to potential customers

In order to develop my business, I need to ensure I can stay in contact with potential customers to market my portraits and services.

<b>What data is held</b>	<ul style="list-style-type: none"> <li>Email address</li> </ul>
<b>Why it is held</b>	<ul style="list-style-type: none"> <li>To contact customers and potential customers</li> <li>To provide regular updates of my work and services</li> <li>To send out marketing and offers</li> <li>To gather feedback and input on particular issues.</li> </ul>
<b>How it is held</b>	<ul style="list-style-type: none"> <li>Database of contact details stored on spreadsheet</li> <li>Email address added to Mailerlite contact list</li> </ul>
<b>How do we seek consent to hold it</b>	<ul style="list-style-type: none"> <li>Enquiries via the website contact form are asked for their consent to hold their contact details in order to add to mailing list</li> </ul>
<b>How we record consent</b>	<ul style="list-style-type: none"> <li>Records are input onto a protected customer database included date of contact.</li> </ul>
<b>How long we hold it for</b>	Ongoing
<b>Process for deletion of records</b>	Should someone decide they no longer wish to receive updates they can unsubscribe either by selecting unsubscribe from one of the Mailerlite emails or by contacting Cheryl Pet Portraits directly.



## 2.2 Customer information

I need to gather customer information to be able to invoice and supply my pet portraits.

<b>What data is held</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Pet name</li> <li>• Email address</li> <li>• Postal address</li> <li>• Social media contact (when applicable)</li> </ul>
<b>Why it is held</b>	<ul style="list-style-type: none"> <li>• To contact, invoice and supply the finished portrait to the customer</li> <li>• To provide regular updates of my work and services</li> <li>• To send out marketing and offers</li> <li>• To gather feedback and input on finished pet portrait.</li> </ul>
<b>How it is held</b>	<ul style="list-style-type: none"> <li>• Records are inputted onto a protected customer database.</li> <li>• Details are added to accounting software for invoicing</li> </ul>
<b>How do we seek consent to hold it</b>	<p>Commission contract including on invoice advises that on payment of invoice consent has been given to hold and use personnel data for supply and marketing.</p>
<b>How we record consent</b>	<p>Electronic copies of invoices and confirmation of payment saved for each customer.</p>
<b>Process for deletion of records</b>	<p>At the beginning of each month, customer records relating to purchase and supply of a pet portrait 6 months since postage date are deleted from the customer database.</p>



### **3. Procedure for responding to subject access requests (SAR) when an individual requests a copy of information held about themselves**

Data subjects have a right to a copy of their data that is held about them by an organisation. If an individual makes a request to see a copy of the record that Cheryl Pet Portraits holds for them then the I will:

1. Acknowledge the individuals request by email within 48 hours of receiving the request.
2. Submit a copy of any data or electronic records that is held within 1 calendar month.

### **4. Procedure for deletion of records**

Cheryl Pet Portraits reviews the records it holds monthly, and deletes customers details relating to the purchase and supply of a pet portrait 6 months since postage date.

## **5. How data protection is designed into systems**

### **5.1 Computer security**

Cheryl Pet Portraits ensures that:

- All laptops and PCs used to access to personal data are password protected and have virus protection software in place.
- The customer database spreadsheet is password protected.

## **6. Procedure for dealing with a security breach**

If, despite the security measures Cheryl Pet Portraits has in place to protect the personal date it holds, if a breach of security occurs, it is important that it is dealt with effectively. The breach may arise from a theft, a deliberate attack on systems, or from accidental loss or equipment failure.

In the event of a security breach the charity Cheryl Pet Portraits will:

1. Assess the scale of the breach, understanding what data has been compromised and whether it is recoverable. Assess the risks associated with the breach including any potential adverse consequences for individuals, how serious they are and how likely are they to happen.



2. Put in place any procedures possible to contain the breach and recover any data lost.
3. Notify those who's data has been breached, explaining what has been accessed, the efforts taken to date to contain the breach and recover data and the plan in place to recover anything further.
4. Investigate the causes of the breach and evaluate the effectiveness of the response to it. Use the learning from these to inform any changes to policies and procedures going forwards.
5. If a serious breach is identified, notify the Information Commissioner Office within 72 hours.