



Turpin Smale Catering Consultants General Data Protection Regulation (GDPR) Policy – Revised November 2018

Turpin Smale's three Owner Directors have a personal commitment to good GDPR practice and overall responsibility for ensuring our organisation complies with our legal obligations.

Charles Manners is our Data Protection Officer whose responsibilities include: Briefing the Board on Data Protection responsibilities | Reviewing Data Protection and related policies | Advising on Data Protection issues | Ensuring Data Protection induction and training takes place (with third parties) | Notification to the Information Commissioners Office (ICO) | Advising on unusual or controversial disclosures of personal data

We are committed to:

1. comply with both the law and good practice
2. protect clients, staff and other individuals
3. respect individuals' rights
4. protect our organisation
5. be open and honest with individuals whose data is held

We are responsible for market research projects and therefore accountable for:

- **Sub-Processing:** We will only engage sub-processors with the prior consent of the controller (or Client) under a written contract. All staff employed for data processing for market research projects, required to collect data, should be required to read, understand and accept our policy relating to GDPR relating to the personal data they may handle in the course of their work, as they will be subject to a duty of confidence.
- **Risks:** We will take appropriate measures to ensure the security of processing. The main risk within our organisation is if information about data gets into the wrong hands and so we will ensure that any and all data, held on behalf of clients, for market research, is password protected.
- **The Controller (or Client):** We will only act on the written instructions of the controller. We will assist the controller in: (a) providing subject access and allowing data subjects to exercise their rights under the GDPR and (b) meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments and (c) submitting to audits and inspections, provide the controller with whatever information it needs to ensure that they are both meeting their Article 28 obligations, and tell the controller immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state.
- **Commitment:** During any market research, we will explain our commitment to ensuring that Data Subjects are aware that their data is being processed and: for what purpose it is being processed | what types of disclosure are likely, and | how to exercise their rights in relation to the data
- **Procedure:** During any market research, if there are standard ways for each type of Data Subject to be informed, these could be given, for example: in a welcome letter or pack or newsletter | during the initial interview with clients | on the web site
- **Retention periods:** We will delete or return all personal data to the controller as requested at the end of the contract.