

SDS GROUP AS A DATA PROCESSOR ACTIVITIES

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1 PURPOSE

This policy and procedure establishes the method in which SDS Group undertake the role of Data Processor for ensuring compliance with the requirements for data transfers by the GDPR.

2 SCOPE

This policy and procedure applies across all entities or subsidiaries owned, controlled, or operated by SDS Group and to all employees, including part-time, temporary, or contract employees, that handle personal data and/or personal data transfers.

3 POLICY STATEMENT

3.1 The SDS Group services offered may require the collection / storage / retention of personal information data to ensure that the Clients service requirements are fully met.

3.2 The following processes may be employed to enable SDS Group to meet these requirements:

- Collection of Client based hard copy archives or documentation.
- The transfer via approved secure methods, electronic data from Clients.
- Pre-preparation including checking suitability of scanning and location of personal data which may be identified to meet the Clients requirements.
- Preparation activities which may involve collection of personal data in line with Clients requirements.
- Scanning activities which may involve collection of personal data in line with Clients requirements.
- General electronic activities which may be required to improve / clean up / prepare files for conversion to final data format.
- Optical Character Recognition to enable Client search function requirements to be obtained.
- Final formatting to the Clients preferred electronic data format. Jpg / tif / pdf etc.
- Secure database data import / input to enable records / items to be found easily or located in a defined manner as per the Clients instructions.
- Transfer of digital copy to secure servers for online cloud storage or via suitable secure alternative to the Client themselves. Encrypted USB / HDD's etc.
- Backup and retention to ensure recovery of systems or digital data as per agreement with Clients.

3.3 In order for The SDS Group to carry out its operations effectively to meet the Client requirements, the following personal data may be collected:

- Name
- Address
- Date of Birth
- Date Died
- Date Started and / or Date Left
- House
- Personal Military information such as Rank, Detachment, Honours, Grave Reference and Others
- Client Company Information

- 3.4 The SDS Group only uses authorised and trained employees to perform any task required to meet the Clients requirements all of which are required to complete a Non-disclosure agreement.
- 3.5 All Clients supplied hard copy or digital archives will be stored in a secure environment.
- 3.6 SDS retains no rights of ownership of any data which we scan or process for our clients. All copyrights and proprietorships remain with our clients. Our clients can have all their data returned to them at request without any penalty or forfeit.
- 3.7 The SDS Group do not own any Client site or system and as such each Client may use SDS Group to host their system or may host it themselves. Systems hosted on Clients own servers etc. are deemed to be outside of SDS Group GDPR requirements.
- 3.8 All personal data collected by SDS Group on behalf of Clients requirements is collected in agreement with the Clients own GDPR commitments.
- 3.9 SDS Group will only collect personal data in line with the Clients agreed requirements.
- 3.10 All Clients systems are provided with encrypted password and username protection, the Client may request for this function to be removed but any personal data affected will remain the responsibility of the Client.
- 3.11 Individual persons may request any information to be removed for SDS Group hosted Client systems at any time without incurring any fees; however SDS Group will seek permission from the Client prior to performing this action.
- 3.12 Clients may request any information to be removed / hidden at any time without incurring any fees.
- 3.13 All Cloud services hosted by SDS Group are regularly SOAK & Stress tested and hosted on UK based servers by Amazon EU.
- 3.14 Disposal of Clients hard copy or electronic archives are undertaken in agreement to the Clients requirements, shredding facilities are available and are performed by approved Third Party companies onsite with a SDS Group approved representative in attendance at all times, on completion a certificate will be provided.

4 RESPONSIBILITIES

- 4.1 The overall responsibility for ensuring compliance with the requirements of the related legislation in relation to performing data transfers activities at SDS Group rests with the Data Protection Officer.
- 4.2 All operating units' staff that deals with personal data is responsible for processing this data in full compliance with the relevant SDS Group policies and procedures.

5 TERMS AND DEFINITIONS

General Data Protection Regulation (GDPR): the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). It also addresses the export of personal data outside the EU.

Data Controller: the entity that determines the purposes, conditions and means of the processing of personal data

Data Processor: the entity that processes data on behalf of the Data Controller

Data Protection Authority: national authorities tasked with the protection of data and privacy as well as monitoring and enforcement of the data protection regulations within the Union

Data Protection Officer (DPO): an expert on data privacy who works independently to ensure that an entity is adhering to the policies and procedures set forth in the GDPR

Data Subject: a natural person whose personal data is processed by a controller or processor

Personal Data: any information related to a natural person or 'Data Subject', that can be used to directly or indirectly identify the person

Privacy Impact Assessment: a tool used to identify and reduce the privacy risks of entities by analysing the personal data that are processed and the policies in place to protect the data

Processing: any operation performed on personal data, whether or not by automated means, including collection, use, recording, etc.

Profiling: any automated processing of personal data intended to evaluate, analyse, or predict data subject behaviour

Regulation: a binding legislative act that must be applied in its entirety across the Union

Subject Access Right: also known as the Right to Access, it entitles the data subject to have access to and information about the personal data that a controller has concerning them

6 RELATED LEGISLATION AND DOCUMENTS

- [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC \(General Data Protection Regulation\)](#)
- SDS Group Data Protection Policy (GDPR/DPP/SDS01_01)
- SDS Standard Data Processing Agreement (GDPR/DTP/SDS05_02)

7 FEEDBACK AND SUGGESTIONS

- 7.1 SDS Group employees may provide feedback and suggestions about this document by emailing mark@sds-group.co.uk.

8 APPROVAL AND REVIEW DETAILS

Approval and Review	Details
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Data Protection Officer	Chave Anderson
Next Review Date	01/05/2021

Approval and Amendment History	Details
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