



Member of the
FEDERATION OF SMALL BUSINESSES

*Coil Slitting Service
for Steel Non-Ferrous
and Plastic*

COIL SLITTING (Letchworth) LTD

STEEL STOCKHOLDERS and SLITTERS

Unit 3 Ashville Trading Estate, Ashville Way
Baldock, Herts SG7 6NN

Telephone: 01462 499600 Fax: 01462 499606
www.coilslitting.co.uk



50 Years' Service
to Industry

*Sheet Shearing Service
Suppliers of Bright Cold
Rolled Strip in Coil*

Personal data is solely held to enable the Coil Slitting (Letchworth Ltd (hereafter known as “the company”) to enable it to trade. No data is sold, and only occasional direct marketing is performed. Data may be shared with third parties for such purposes as banking, to reduce credit and fraud losses, reporting to HMRC and for invoice discounting. Data is regularly archive and only held for the minimum statutory period.

The company has not appointed a Data Protection Officer (DPO); see section 3.6as it is not required to do so under the GDPR as the company:

- 1 Is not a public authority or court.
- 2 Does not perform large scale regular and systematic monitoring of individuals
- 3 Does not perform processing of special categories of data or data relating to criminal convictions and offences.

Further personal data is only held in five commercial systems:

- 1 Sage 50 Accounts – customer and supplier data
- 2 Sage 50 Payroll – staff personal data
- 4 Optac - drivers tachographs

Data is only held by the company to enable it to trade, pay its employees and it meet its statutory legal requirements.

Data Controllers

Iain DA Costa	Director
Mike Humphries	Director
Christine Smyth	Company Accountant



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Controllers checklist

Step 1 of 4: Lawfulness, fairness and transparency

1.1 Information you hold

1.1.1 Customers and Suppliers:

Contact and bank details

Record of purchases and payments

These are held in Sage 50 accounts, encrypted and password protected.

Customer details may be supplied to a third party (i.e. bank or credit reference agencies) to obtain a credit limit, prevention of fraud and for invoice discounting.

Data is archived at regular intervals with old data being removed from Sage 50 Accounts. Archived data is held for the statutory legal minimum period.

1.1.2 Staff:

Personnel and bank details to be able to pay remuneration and expenses.

These are held in Sage 50 Payroll encrypted and password protected.

Data is sent to HMRC and Pension Provider as required by law.

Archived data is held for the statutory legal minimum period.

1.2 Lawful basis for processing personal data Lawful basis for processing personal data

The lawful basis for processing personal data is consent and contract and is solely to enable the company to trade.

1.3 Consent

The company only holds the minimum information required to trade, it only performs limited direct marketing and includes instructions to opt out.

It does not process any information about minors.

1.4 Consent to process children's personal data for online services

Not applicable



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1.5 Vital interests

The company may record personal data relevant for emergency medical care only if the employee consents and only for as long as the employee consents.

1.6 Legitimate interests

The company only hold personal data to be able to trade and pay its employees and the data is only processed in a manner that you be expected.

No personal data of minors is processed

1.7 Data Protection Fee

The company is registered with the Information Commissioner's Office.

Step 2 of 4: Individuals' rights

2.1 Right to be informed including privacy information

Personal data is provided by customers, suppliers or employees. The company from time to time may obtain information about you from third party sources, such as public databases (for example, Companies House), and other third party data providers. The company take steps to ensure that such third parties are legally permitted or required to disclose such information to us. This information, alone or in combination with other information (including personal data) that the company collect for credit risk and fraud reduction and to develop and provide you with more relevant products features, and services and.

2.2 Communicate the processing of children's personal data

The company does not process any children's personal data

2.3 Right of access

The company recognises the right of access to personal data.

2.4 Right to rectification and data quality

The company recognises the need for complete and accurate data and will ensure all rectifications are performed in a timely manner.

2.5 Right to erasure including retention and disposal

The company only hold personal data to enable it to trade, data is regularly archived and only held for the legal statutory minimum. Requests to erase data will be implemented provided the request does not infringe the minimum legal statutory time the data must be stored.

2.6 Right to restrict processing

The company respects the right to restrict processing.



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2.7 Right to data portability

The company ensures that data portability is implemented in conjunction with their third parties to ensure it can receive personal data and easily move, copy or transfer that data from one business to another in a safe and secure way.

2.8 Right to object

Not applicable as personal data is only used to enable the company to trade.

2.9 Rights related to automated decision making including profiling

Not applicable, the company does not perform any automatic decision making.

Step 3 of 4: Accountability and governance

3.1 Accountability

A privacy policy is in place, to ensure that personal data is only held in the five systems and that in the event it has to be exported from a system it is either immediately processed or stored in an encrypted format.

The privacy policy is reviewed against performance to ensure compliance on a regular basis.

The privacy policy provides training on data protection and employees are regularly checked for compliance.

3.2 Processor contracts

The company has written contracts with all processors that it uses.

3.3 Information risks

Information risk is managed by using commercial systems and tier 1 suppliers. Risks are reviewed at the same time as the privacy policy.

3.4 Data Protection by Design

Data protection by design is by the use of commercial systems and ensuring only essential personal data is stored.

3.5 Data Protection Impact Assessments (DPIA)

The DPIA will be performed with the privacy policy review, but it is considered unlikely that there will be any high risks due to the minimal personal data held and that just standard business processes for a small company in the steel industry are used.



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3.6 Data Protection Officers (DPO)

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Further personal data is only held in five commercial systems:

- 1 Sage 50 Accounts – customer and supplier data
- 2 Sage 50 Payroll – staff personal data
- 4 AMS Fleet Manager - tracking the movement of our lorries and trucks
- 5 Optac - drivers tachograph information

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3.7 Management Responsibility

The company has a very flat management structure with their being just a Chief Executive Office and a Company Secretary. Both promote a positive attitude to data protection.

Step 4 of 4: Data security, international transfers and breaches

4.1 Security policy

It is a simple network with a single server and data router. The updates are applied to the server and all PC's, which have personal firewalls and anti-virus software. The router firmware is upgraded when a new version becomes available. The router does not use default passwords, only has the ports that are in use open and they are changed to non-standard port numbers. Remote access to the network is limited and only opened as and when needed.

4.2 Breach notification

The company is aware of the need to notify the ICO if a notable breach occurs, but due to the minimal amount and type of personal data stored and that regular backups are taken it is unlikely a notifiable breach will occur.

4.3 International transfers

Not applicable there are no international transfer of personable data.