

## GENERAL DATA PROTECTION REGULATION POLICY – Regulation (EU) 2016/679

**JJ THOMPSON LTD – Registered No 812727**

**95 HILL STREET**

**SHEFFIELD S2 4SP**

This policy begins by establishing the main principles that must be adopted when considering record retention and protection. It then sets out the types of records held by JJ Thompson Ltd and their general requirements before discussing record protection, destruction and management.

In its everyday business operations **JJ Thompson Ltd. is the (Data Processor)** collecting and storing records of many types and in a variety of different formats that are provided by our **customers who are (Data Controllers)**. The relative importance and sensitivity of these records also varies and is subject to the organisation's security classification scheme.

It is important that these records are protected from loss, destruction, falsification, unauthorised access and unauthorised release and a range of controls are used to ensure this, including backups, access control and encryption.

JJ Thompson Ltd. also has a responsibility to ensure that it complies with all relevant legal, regulatory and contractual requirements in the collection, storage, retrieval and destruction of records. Of particular relevance is the European Union General Data Protection Regulation (GDPR) and its requirements concerning the storage and processing of personal data.

This control applies to all systems, people and processes that constitute the organisation's information systems, including board members, directors, employees, suppliers and other third parties who have access to JJ Thompson Ltd. systems.

This document outlines our General Data Protection Regulation Policy which becomes law on 25th May 2018 in respect of formats and content of data held, how it is used and shared, secure retention and disposal.

J J Thompson Ltd. **(Data Processor)** will not disclose or share the data with any third Party without the written consent of the Customer **(Data Controller)**

In order to assist with the definition of guidelines for record retention and protection, records held by JJ Thompson Ltd. are grouped into the categories listed on the following page. J J Thompson **(Data Processor)** will use data provided by the customer **(Data Controller)** only for the purposes detailed, and for no other purpose without authority from the customer **(Data Controller)**.

For each of these categories of data, the security and storage media are given, together with retention period and a reason for use.

JJ Thompson data is held as:

- Hardcopy – in the form of Account Application forms – filed in locked cabinets
- In Labtrac which is a bespoke laboratory software – held on server
- In Sage accounting software – held on server

The information we hold:

#### Practice Data

- Clinician Name, Practice Name, Address, Tel No, Email, and in some cases personal mobile and email addresses if we have been requested to use as alternative.
- Clinician GDC No. - in some cases
- Practice number and Clinician number – if provided

#### Patient Data – provided by Customer (**Data Controller**)

- Scanned copy of appliance prescription with patient name, number and home address if supplied by clinician – held on server for 5 years rising to 10 years in 2020
- Digital study models with patient name and number – held for two years after scanning – held on server
- Digital set ups for Aligner cases with patient name and number– held for two years after scanning – held on server
- Digital files with patient name and number that the customer has requested us to retain for long term retention cases – held on server

#### Patient Data on our Online Portal –controlled by Customer (**Data Controller**)

- Digital study models with patient name and number – stored until customer deletes or requests deletion.
- Virtual set ups with patient name and number – stored until customer deletes or requests deletion.
- Patient images that have been uploaded by clinician/practice – stored until customer deletes or requests deletion.

#### How we use your information

- Name and Address – general day to day business, occasional relevant advertising
- Telephone number – contacting you
- Email address - sending statements, contacting you, sending occasional relevant advertising

#### Our Server is

The information on the server at JJT is compressed and encrypted by VEEAM.

The server is backed up nightly onto multiple encrypted hard drives and the hard drives are removed from site by either the General Manager or Laboratory Manager.

The server has external physical protection by means of a physical firewall and F secure software.

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#### Our Portal

Our web portal is hosted at Amazons London datacentre and uses secured, encrypted connections. All data stored here is stored on UK based servers.

## Third Parties

- Couriers and Royal Mail - customer Name, Address, practice telephone number and contact email are held in our online address books of our shipping partners websites, to enable us to arrange shipments and collections from your practice.  
Our shipping partners: Royal Mail, Fedex, DHL, UK Mail, Parcelforce, and UPS all have secure password protected interfaces.

As **Data Processor** J J Thompson will endeavour to review the accuracy of the personal data and make any necessary changes to any personal data which is inaccurate or requires updating.

Data Subjects have the rights in relation to their personal data under the Privacy Legislation.

Those rights include ;

- (i) The right to be informed
- (ii) The right of access
- (iii) The right to rectification
- (iv) The right to erasure
- (v) The right to restrict processing
- (vi) The right to data portability
- (vii) The right to object
- (viii) Rights in relation to automated decision making and profiling

To facilitate the above rights, the **(Data Processor)** agrees to store or record the **Personal Data** detailed above in a structured, commonly used and where possible machine readable form.

In addition to the record keeping obligations J J Thompson Ltd **(Data Processor)** acknowledges that the Customer **(Data Controller)** reserves the right to request details of the records held and maintained by the **Data Processor** and reserves the right for personal data use to be restricted, returned or destroyed.

Under such circumstances J J Thompson Ltd **(Data Processor)** shall provide conformation to the customer **(Data Controller)** that the data in question has been restricted, returned or destroyed.

J J Thompson Ltd **(Data Processor)** will maintain a record of requests or complaints from data subjects seeking to exercise their rights under the **Privacy and Data Protection Legislation**, including requests for **Personal Data**. The records will include copies of the request for information or complaint, details of the

data accessed and shared and where relevant, notes of any meeting, measures taken by the **Data Processor** to resolve the complaint, correspondence or phone calls relating to the request or complaint.

J J Thompson (**Data Processor**) will implement appropriate technological and organisational measures to:-

- Prevent unauthorised or unlawful processing of the **Personal Data**;
- Prevent the accidental loss or destruction of, or damage to, **the Personal Data**
- Ensure a level of security appropriate to:
  - the harm that might result from such unauthorised or unlawful processing or accidental loss, destruction or damage; and
  - the nature of the **Personal Data** to be protected

It is the responsibility of each Part to ensure that its staff members are appropriately trained to handle and process Personal Data.

J J Thompson Ltd (**Data Processor**) is under a strict obligation to immediately notify the customer (**Data Controller**) of any **Data Security Breach** and no later than within 24 hours of the **Data Processor** becoming aware of the breach.