

Spotlight Cleaning Services Limited

GDPR Policy and Guidelines

Spotlight Cleaning Services Limited have been registered and certified with ICO since 2007. Registration No: Z100379X.

The named Data Controller is Yvonne Jones, Director. She is responsible for ensuring that all data held by the company is relevant. All information kept is not passed to a third party unless legally required to do so.

Our information Security Policies cover the following areas;

- Access Control
- Passwords & Encryptions
- Remote Access
- Bring Your Own Device (BYOD)
- Clear Desk & Screen
- Secure Disposal
- Business Continuity Plan/Disaster Recovery

We ensure that personal data is automatically protected in any IT system by using strong password protected computer access for service users. All users regularly change passwords.

Reputable IT providers for Payroll and accounts. SAGE.

Our website was updated in 2018 to show our GDPR privacy notice.

All systems, devices and networks have up to date firewall, malware scanning and anti virus protection systems.

All information collected and stored is purely for the purpose of fulfilling contracts.

All systems and procedures are in place conforming to ICO GDPR requirements.

Systems are in place should we have a request for; access, rectification, deletion or portability. The relevant request form is issued and upon receipt the Data Controller investigates and replies within one month.

Right to deletion/erasure requests are reviewed and the data analysed. HMRC requires that accounting and payroll information is kept for 6 years. Therefore the request system does

not provide an absolute right to be forgotten.

Consent Based Processing

All information requested, by us, is for the sole purpose of meeting the contract. Irrespective of the manner in which this information is received and recorded e.g. information gained from application forms, supplier invoices, emails etc.

However, despite the fact that we do not use any data for reasons other than meeting the contract our systems include procedures for requesting permission to actively use certain data by gaining signed consent forms against specified data types.

Maintaining Records of Personal Data

Employee personal data is stored in Sage Payroll. These systems themselves are password protected and the computer hosting the system is protected with different passwords. The passwords are strong and reviewed.

Paper data is stored in locked filing cabinets with the only keys being held by the Data Processor.

Customer and Supplier data is stored on Sage Accounts. These systems themselves are password protected and the computer hosting the system is protected with different passwords. The passwords are strong and reviewed.

Paper data is stored in locked filing cabinets with the keys being held by the Data Controller.

Paper data is reviewed regularly and all confidential paperwork is shredded using auditable suppliers.

Testing, Assessing and Evaluation.

Spotlight Cleaning Services conduct information audit in order to identify our data flows into, through and out of our business.

The results of the audits are then risk assessed. These audits are carried out annually by the Data Controller.

To ensure continuing legal compliance our systems and procedures are tested against the requirements of the ICO using tools available on the ICO website. These test are carried out annually, or after known changes, by our Data Controller.

Signed:

Date: September 2023

A handwritten signature in black ink, appearing to read 'K.D. Jones', is written over a faint, light blue grid background. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

K.D.Jones

Director – Spotlight Cleaning Services Limited