

Hammonds Enterprises Ltd GDPR Policies and Procedures

The following policies and procedures have been adopted Hammonds Enterprises Ltd to comply with current GDPR legislation. Hammonds Enterprises Ltd is a private limited company by shares, offering services in language translation, education and research.

1. Awareness

Hammonds Enterprises Ltd (hereafter the Company) collects data for the purposes of translation, education and research, and the Company does not hold information about any individual with the purpose of contacting them for business or any other purposes. Personal/business details that come into the possession of the Company are on documents primarily for translation, or for research purposes, or for academic assessment. These details are destroyed within a maximum of three years of the contract completion and all electronic data is automatically shredded and erased.

2. Information

2.1. For the purpose of carrying out its functions as, the personal information held by the Company, which is normally only contained on documents to translate may consist of some or all of the following:

- Name
- Address
- Contact telephone
- Contact email
- CV type data

Such personal details as are relevant to the subject matter of the translation.

2.2. A person who is the subject matter of a translation etc may at any time request to see the information that the Company holds on them. If such a request is made, then the Company secretary must comply with the request within thirty days from the date of request.

3. Personal Data

3.1 Personal data is stored in two areas:

- On research material stored on a protected Company hard drive where applicable.
- In documents for translation, stored on a protected Company hard drive where applicable.

4. Individual Rights

4.1. Under GDPR legislation people whose details may be stored by the Company have certain rights in relation to the data held by the Company about them. Under GDPR any individual who becomes aware that their personal data is being stored for translation, education or

research purposes, may ask the Company to delete this data. And the Company will do so, although if this is in relation to work ongoing the Company will charge fully for the research, education or translation work.

- 4.2. The Directors of the Company have considered the 'right to restrict processing' and the 'right to data portability' under GDPR and do not consider them to be relevant to the business of the Company.
- 4.3. Under the right to object, the Directors of the Company have considered Article 22 of GDPR and deem it not to apply to business operations of the Company.

5. Lawful Basis for Processing Personal Data

The lawful basis for the Company processing personal data is consent. All documents received by the Company, for translating, education or research purposes is given by the individual for a specific purpose, which is clearly understood by the person, and the person implicitly agrees to the retention of that data for that purpose for the duration of the project, after which time the data is destroyed, it is not passed on to any third party, or used by the Company for any other purposes related to the Company's business.

6. Children

6.1 The Company has no direct dealings with children. If the Company receives any documents that relate to children, then these are received with the permission of their parent or guardian, or a legal public authority. No contact is made with a child by any member of the Company

7. Data Breaches

- 7.1. In the event of a data breach the Company shall nominate the company secretary to carry out an investigation into how the breach occurred and how to prevent further breaches in the future.
- 7.2. The directors of the Company may at its discretion choose to appoint a designated Data Protection Officer from within the Company to oversee/undertake any investigation of a data breach.
- 7.3. Having considered the concept of the Data Protection Impact Assessment concept in GDPR, the Company has concluded that the type of data held by the Company does not require this to be considered.

8. International

The Company does work internationally with organisations currently within the European Union in the translation section of the Company. The Company enters into contracts with its EU clients on the GDPR terms and conditions of the client organisation and is expecting to do so post Brexit. The Company therefore intends to comply with the relevant member state legislation as prescribed by the Company's clients on a contract by contract basis.

