Ceewhy-Vancouver Ltd needs to collect and use certain types of information about the Individuals or Service users who come into contact with Ceewhy-Vancouver Ltd in order to carry on our work.	State the name of your business or organisation that is collecting data. If an individual then state name.
Scope of this Privacy Policy	
Any personal information needed for procedural processing must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the Data Protection Act 1998 and General Data Protection Regulations, referred to here on in as GDPR.	**However you store this data - even if on paper it must be controlled and under lock and key. Or such security measures to prevent data leakage.**
Data Controller	**Do you need to be a Data Controller.. That is dependent on how sensitive the information is. Generally 'NO' for simple business use – basic name address telephone number.**
Ceewhy-Vancouver Ltd is the Data Controller under the Act, and is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.	
Disclosure	**What ever you do, in either case, you will need to specify how you are handling the data.**
Ceewhy-Vancouver Ltd may share data with other agencies as necessary for forwarding shipping and handling of products and service routed through our systems.	**For general business use of simple names addresses and telephone numbers as an organisational list etc.. Is not necessary to register.**
The Individual or Service user will be made aware in most circumstances as how and with whom their information will be shared. There are circumstances where the law allows Ceewhy-Vancouver Ltd to disclose data (including sensitive data) without the data subject's consent.	**The problem comes if you are linking data to specific people, like medication, abuse, specific illness.**
These are:	**Anything that is of a personal nature.**
• Carrying out a legal duty or as authorised by the Secretary of State	**I have categorised my main areas of sensitive data and you need to do the same for your business or organisation.**
• Protecting vital interests of an Individual or Service user	
• The Individual or Service user has already made the information public	
• Conducting any legal proceedings, obtaining legal advice or defending any legal rights	
• Providing a confidential service where the Individual or Service user's consent cannot be obtained or where it is reasonable to proceed without consent	
Ceewhy-Vancouver Ltd regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.	**State your purpose for this Privacy Protection statement.**
Ceewhy-Vancouver Ltd intends to ensure that personal information is treated lawfully and correctly.	**Specify some kind of re-assurance on your guide lines.**
	State that you adhere to the principles of GDPR and your data will only be stored on EU - UK file based or web - cloud based systems that come under EU-US Privacy agreements.
To this end, Ceewhy-Vancouver Ltd will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998 and subsequent GDPR legislation.	

Specifically, the Principles require that personal information shall be:	
• obtained only for one or more of the purposes specified in the Act	
• adequate, relevant and not excessive in relation to those purpose(s)	
• accurate and where necessary, kept up to date	
• not kept for longer than is necessary, only for the duration of supplying a service or until termination of an account held with us	
• processed in accordance with the rights of data subjects under the Act	
• kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information	
• not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals - Service users in relation to the processing of personal information	
Ceewhy-Vancouver Ltd will, through appropriate management and strict application of criteria and controls:	**Only store what you need to have, DON'T start building a profile on the person unless it falls within the remit of the work you are processing for this person.**
• Observe fully conditions regarding the fair collection and use of information	
• Meet its legal obligations to specify the purposes for which information is used	**The DPO state that you need to give a given time frame of how long you will hold the data – in our case this is based on other factors. We push the data back to our customers once the work is completed.**
• Collect and process appropriate information, and only to the extent that is needed to fulfil its operational needs or to comply with any legal requirements	
Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:	**If some one wants know what information you hold on them – if any. Then identify the person before releasing the data.**
• The right to be informed that processing is being undertaken	
• The right of access to one's personal information	
• The right to prevent processing in certain circumstances	
• The right to correct, rectify, block or erase information which is regarded as wrong information	
• The right to be forgotten	
	The Right to be Forgotten.
Take appropriate technical and organisational security measures to safeguard personal information.	**If someone wants the data removed. Then do so!! And inform them in writing or email or some kind of recordable trace.**
Ensure that personal information is not transferred abroad without suitable safeguards and in accordance with GDPR and EU-US Privacy Shield Frameworks.	**Careful with this one.. MAKE SURE your online storage is part of the agreement processes between EU and wherever.**
Set out clear procedures for responding to requests for information.	**Some storage cloud systems fall outside of this regulation**

Data Collection An Individual or Service user clearly understands why their information is needed, who it will be shared with, and the possible consequences of them agreeing or refusing the proposed use of the data. Ceewhy-Vancouver Ltd will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form. When collecting data, Ceewhy-Vancouver Ltd will ensure that the Individual or Service user clearly understands why the information is needed.	**As above. MAKE SURE you Identify the person or Persons applying for information have a right to access.**
Data Storage Information and records relating to Service users will be stored securely and will only be accessible to authorised staff. Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately. It is Ceewhy-Vancouver Ltd responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.	**IMPORTANT.** **ACCESS BY AUTHORISED STAFF.** **Ensure that due diligence is carried out and that no information however small can be gained by non authorised staff**
Data access and accuracy All Individuals - Service users have the right to access the information Ceewhy-Vancouver Ltd holds about them. In addition, Ceewhy-Vancouver Ltd will ensure that: - It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection and GDPR - Everyone processing personal information understands that they are contractually responsible for following good data protection practice - Everyone processing personal information is appropriately trained and supervised to do so - Anybody making enquiries about personal information is passed to appropriately trained staff - It deals promptly and courteously with any enquiries about handling personal information.	**I have chosen the wording of Data Protection Officer** **That does not mean that this officer is registered with the Data Protection Office.** **In our case we handle data that could be re used for other purposes.** **But our processes have changed to put the onus back on our customers to hold the storage of data themselves once the work has been completed.**

• It describes clearly how it handles personal information	
• It will regularly review and audit the ways it holds, manages and uses personal information	
• It regularly assesses and evaluates its methods and performance in relation to handling personal information	
• All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them	
This policy will be updated as necessary to reflect best practice in data management, security and control, and to ensure compliance with any changes or amendments made to the General Data Protection Regulations - GDPR and EU-US Privacy Shield Frameworks.	
In case of any queries or questions in relation to this policy please contact the Ceewhy-Vancouver Ltd Data Protection Officer.	
Notes	**General area for describing in more detail on our specific operations.**
Notification - means: notifying the Information Commissioner about the data processing activities of Ceewhy-Vancouver Ltd, as certain activities may be exempt from notification.	
Processing - means: collecting, amending, handling, storing or disclosing personal information.	
Personal Information	**How we handle sensitive areas**
Information about living individuals that enables them to be identified - e.g. name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within a collective.	
Ceewhy-Vancouver Ltd does not handle sensitive data that refers individuals to data about:	
• Racial or ethnic origin	
• Political affiliations	
• Religion or similar beliefs	
• Trade union membership	
• Physical or mental health	
• Sexuality	
• Criminal record or proceedings	

Notes...