



# Gardiners and Data Protection

This document gives a broad outline to our approach and processes relating to our compliance with data protection regulation. Feel free to contact us for any further information on any areas of this document.

## What is GDPR and how do we protect data

The General Data Protection Regulation (GDPR) is a piece of EU legislation that came into effect on 25 May 2018 and supersedes the Data Protection Act. The aim is to keep individual's data safe and provide the ability to identify how their personal information is being used. The GDPR applies to all organisations established in the EU and the processing of personal data of any individual residing in the EU.

GARDINER BROS & CO (LEATHERS) LIMITED (Gardiners) recognise the principles enshrined in the General Data Protection Regulation (EU Article 29) and other regulations. Gardiners already has strong data security processes in place, however we've reviewed what we do to ensure our policies, processes and procedures continue meet our requirements under the new regulation. Under these regulations, Gardiners is a Data Controller of the personal data that it gathers on its customers. In some cases, we act as a Data Processor on behalf of our customers to provide a direct despatch service.

As a Data Controller and a Data Processor, we have an obligation to provide information to our customer and third parties about how we process your data in a fair and transparent manner. This document explains the following

- What type of information we collect
- How we may use any personal information we hold
- ICO Registration
- Details of any 3<sup>rd</sup> Party Processors we use
- How the information is stored
- Our data retention and disposal policy
- Who oversees Data Protection Policy
- How is Data Protection implemented at Gardiners

For all enquiries related to GDPR, please contact us at

Data Protection Team

Gardiner Bros & Co (Leathers) Ltd,

Units F&G, Quedgeley West Business Park,

Bristol Road, Hardwicke,

Gloucester,

GL2 4PH

Email : [gdpr@gardinerbros.co.uk](mailto:gdpr@gardinerbros.co.uk)

## Gardiner Bros & Co (Leathers) Ltd

Units F&G, Quedgeley West Business Park, Bristol Road, Hardwicke, Gloucester, GL2 4PH. WEB: [www.gardinerbros.co.uk](http://www.gardinerbros.co.uk)

T: 01452 727300 (GENERAL) T: 01452 727302 (ORDERS) F: 01452 727305 E: [sales@gardinerbros.co.uk](mailto:sales@gardinerbros.co.uk)

Directors: R.J. Gardiner F.C.A., P.G. Gardiner F.C.A., M.B.A., J.R.P. Gardiner A.C.A. L.L.B., B.J. Gardiner M.R.T.P.I., M.D. Holloway BA(Hons)  
Registered in England No. 534801



### **What information we collect**

As part of our day to day business we will store information you provide about your business and key contacts within your business. As a processor we will process our customers data to fulfil orders

### **How we may use any personal information we hold**

We only use information about you in order to provide you with the services for which we provide to you. We do not share or pass this information to 3<sup>rd</sup> Parties unless it is essential to fulfil our obligations to you.

### **Is Gardiners registered with the ICO?**

Gardiners has been registered as a Data Controller with the Information Commissioners Office (ICO) since 2002 under registration number Z6469327

### **Details of any 3rd Party Processors we use**

Where necessary for our contract we will provide your information to 3<sup>rd</sup> Parties where their services are required for us to fulfil our obligations to you. This will include passing delivery addresses to carriers to deliver your order as requested. We will also pass some company information to our banking services providers (Bank, Credit Reporting Service to allow us to financially manage your customer account)

In all cases we have confirmed that 3<sup>rd</sup> Party services we use will protect your data in line with our GDPR policy. We will continue to ensure that protection continues and is applied to any new processors we look at using to provide you with the required services.

### **How the information is stored**

Your information is stored on our IT systems. We have conducted Data Flows on our systems to identify where data comes into our systems, how it is stored and how we output that data. Our computer systems use the latest software and implement best practice for updates. We have also invested heavily in our platforms over the last year to bring new hardware to support high availability and network resilience and security.

We implement secure transmission where possible on all inputs and outputs and are working with our customers to move towards 100% secure transmissions.

### **Our data retention and disposal policy**

For our business customers we will maintain data for no longer than is necessary. In many cases there are regulatory requirements such as HMRC that require us to keep documents for extended periods of time. This data is stored securely and contains little or no personal information.

For cases where we act as a Processor, we will typically maintain data for no more than 3 months after the completion of the transaction. After that point, we will delete or fully anonymise that data.

Where paper records are created within the business, sensitive information is disposed of securely. We are currently changing this process to move to shredding 100% of physical printed data generated by the business.

### **Who oversees the Data Protection Policy at Gardiners**

Gardiners have a working group of 8 people from core areas of our business that meet regularly to review, improve and audit our data protection processes. This team includes a member of the Board and provides updates on progress at each Board Meeting. We have also appointed an external GDPR Practitioner who provided consultancy and auditing services to the team.

### **How is Data Protection implemented at Gardiners**

We have made positive changes to our working practices to continue to improve our data security. These practices are clearly defined in our staff handbooks. We provide training to new and current staff on our best practices. With our external consultant, we carry out audits of the efficacy of these processes.

#### **Gardiner Bros & Co (Leathers) Ltd**

Units F&G, Quedgeley West Business Park, Bristol Road, Hardwicke, Gloucester, GL2 4PH. WEB: [www.gardinerbros.co.uk](http://www.gardinerbros.co.uk)

T: 01452 727300 (GENERAL) T: 01452 727302 (ORDERS) F: 01452 727305 E: [sales@gardinerbros.co.uk](mailto:sales@gardinerbros.co.uk)

Directors: R.J. Gardiner F.C.A., P.G. Gardiner F.C.A., M.B.A., J.R.P. Gardiner A.C.A. L.L.B., B.J. Gardiner M.R.T.P.I., M.D. Holloway BA(Hons)

Registered in England No. 534801