



1.2 Data Protection Policy

Simply Crown and Bridge – Data Processor

Document Ref.	1.2 Data Protection Policy
Version:	1.0
Dated:	04 June 2018
Document Owner:	Julian Reed, Director


Revision History

Version	Date	Revision Author	Summary of Changes

Distribution

Name	Title
All employees	Distributed to all Simply Crown and Bridge employees

Approval

Name	Position	Signature	Date
Julian Reed	Director		04 June 2018

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1 Introduction

Simply Crown and Bridge is committed to protecting the rights and privacy of individuals whom they process personal data and conducting its business operations in accordance with all applicable Data Protection laws and regulations.

The General Data Protection Regulation 2016 EU 2016/679 (GDPR) has replaced the Data Protection Directive 1995/46/EC and became enforceable as of 25th May 2018. The regulation introduces a higher demand for transparency and accountability on how personal data is managed. It also provides new and stronger rights for individuals to understand and control that use.

This policy sets out the expectation of Simply Crown and Bridge in relation to the processing of any personal data, to demonstrate the enhanced protection of personal data.

Simply Crown and Bridge is fully committed to ensuring continued and effective implementation of this policy, and expects all employees including board members and directors to share this commitment. Any breach of this policy will be taken seriously and may result in disciplinary action.

2 Scope

The policy applies to all systems, people and processes where a Data Subject's personal data is processed:

- Customers/patients
- Users of its website <http://www.simplycrownandbridge.co.uk/> or applications ("Apps")
- Other stakeholders.

The policy applies to all processing of personal data in electronic form (including electronic mail and documents created using word processing software, e.g. Microsoft Office tools) or where it is held in manual files that are structured in a way that allows ready access to information about individuals (e.g. organised paper records held in a filing cabinet).

The protection of personal data belonging to employees is not within the scope of this policy. It is covered in the Simply Crown and Bridge Employee Data Protection Policy.

3 Definitions

The following definitions with respect to this policy are as follow:

Personal data

“any information relating to an identified or identifiable natural person (‘data subject’); in an identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or society identity of that natural person”.

Any information (including opinions and intentions) which relates to an identified or identifiable natural person.

Processing (may also be referred to as “process” or “processed”)

“any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction”.

Data Controller (The Dental Practice)

Any natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purpose and means of the processing of personal data.

Data Processor (Simply Crown and Bridge)

A natural or legal person, public authority, agency or other body which processes personal data on behalf of a Data Controller.

Data Subject

The identified or identifiable natural person to which the data refers to, for example, patients.

Employee

An individual who works part-time or full-time for Simply Crown and Bridge under a contract of employment, including independent contractors.

Third Parties

An external organisation with which Simply Crown and Bridge conducts business and is under the direct authority of Simply Crown and Bridge to process personal data.

4 Policy

This policy shall be available to all Simply Crown and Bridge employees. The policy is made effective of 4th June 2018.

4.1 Data Protection Principles

Simply Crown and Bridge has adopted the following principles, which the GDPR is based, to govern its processing of personal data.

- **Principle 1: Lawfulness, fairness and transparency**
“Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject”. This means that Simply Crown and Bridge must tell the data subject what processing will occur (transparency), the processing must match the description given to the Data Subject (fairness), and it must be for one of the purposes specified in the applicable Data Protection regulation (fairness).
- **Principle 2: Purpose limitation**
“Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes”. This means that Simply Crown and Bridge must specify exactly what the personal data collected will be used for and limit the processing of that personal data to only what is necessary to meet the specified purpose, under the instruction of the Data Controller.
- **Principle 3: Data minimisation**
“Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed”. This means that Simply Crown and Bridge must not store any personal data beyond what is strictly required.
- **Principle 4: Accuracy**
“Personal data shall be accurate and, where necessary, kept up to date”. This means that Simply Crown and Bridge must, under the instruction of the Data Controller, have a process in place for identifying and addressing out-of-date, incorrect and redundant personal data.
- **Principle 5: Storage limitation**
“Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed”. This means that Simply Crown and Bridge must, wherever possible, store personal data in a way that limits or prevents identification of the data subject.
- **Principle 6: Integrity and confidentiality**
“Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage”. Simply Crown and Bridge must use appropriate technical and organisational

measures to ensure the integrity and confidentiality of personal data is maintained at all times.

The Data Controller (Dental Practice) shall be responsible for, and be able to demonstrate compliance. This means, being accountability for and demonstrating compliance that the six Data Protection principles are met for all personal data which it is responsible for.

4.2 Data Protection Officer

A defined role of Data Protection Officer (DPO) is required under the GDPR if an organisation is a public authority, if it performs large scale monitoring or if it processes special categories of personal data on a large scale. Based on these criteria, Simply Crown and Bridge does not require a DPO.

4.3 Data Subjects

The data subjects have rights under the GDPR and Simply Crown and Bridge will establish a system to facilitate the exercise of such rights. These consist of:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Each of these rights must be supported by appropriate procedures of the Data Controller, however Simply Crown and Bridge need to be aware of the legal requirements and liaise with the Data Controller. With the intention this will allow the required action to be taken within the timescales stated in the GDPR.

Timescales for Data Subject Requests:

Data Subject Request	Timescale
The right to be informed	Within one month
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

4.4 Data Subject Consent

It is the responsibility of the Data Controllers to lawfully obtain consent from data subjects.

4.5 Privacy by Design

Simply Crown and Bridge has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect or process personal data will be subject to due consideration of privacy concerns, including the completion of one or more data protection impact assessments (DPIA).

The DPIA will include:

- Consideration of how personal data will be processed and for what purposes
- Assessment of whether the proposed processing of personal data is both necessary and proportionate to the purpose(s)
- Assessment of the risks to individuals in processing the personal data
- What controls are necessary to address the identified risks and demonstration compliance with legislation
- Consultation with the Data Controller.

Use of techniques such as data minimisation and pseudonymisation should be considered where applicable and appropriate.

4.6 Transfers of personal data

Simply Crown and Bridge may transfer personal data to internal or third-party recipients located in another country where that country is recognised as having an adequate level of legal protection for the rights and freedoms of the relevant data subjects. It is the responsibility of the Data Controller to ensure to review, prior to given the instruction to the Data Processor, that the transfer taking place falls within the limits imposed by the GDPR.

4.7 Transfers of personal data to third parties

Simply Crown and Bridge will only transfer personal data to, or allow access by, third parties when it is assured that the information will be processed legitimately and protected appropriately by the recipient.

Where the third party is deemed to be a Data Controller, Simply Crown and Bridge will enter into an appropriate agreement with the Controller to clarify each party's responsibilities in respect to the personal data transferred.

Where the third party is deemed to be a Data Processor, Simply Crown and Bridge will enter into a Data Processing agreement with the Data Processor. The agreement must require the Data Processor to protect the personal data from further disclosure and to only process personal data in compliance with Simply Crown and Bridge

instruction; in addition, the agreement will require the Data Processor implement appropriate technical and organisational measures to protect and personal data as well as procedures for providing notification of personal data breaches.

When Simply Crown and Bridge is outsourcing services to a third party (including Cloud Computing services), they will identify whether the third party will process data on its behalf and whether the outsourcing will entail any third country transfers of personal data. In either case, it will make sure to review the technical and organisational measures they have taken place.

4.8 Breach notification

It is Simply Crown and Bridge's policy to be fair and proportionate when considering the actions taken to inform affected parties regarding breaches of personal data. The GDPR states that the Data Controller has the responsibility of reporting personal data breaches to the supervisory authority or data subjects within 72 hours or without undue delay, if applicable. Simply Crown and Bridge, as the Data Controller, has the responsibility of reporting personal data breaches to the Data Controller without undue delay.

Any individual who suspects that a personal data breach has occurred must immediately report it to info@simplycrownandbridge.co.uk to allow for the Data Controller to be notified without undue delay.

4.9 Addressing compliance with the GDPR

The following actions are undertaken to ensure that Simply Crown and Bridge support the compliance of the accountability principle of the GDPR which the Data Controller has the responsibility to comply:

- The legal basis for processing personal data has been set out by the Data Controller and is communicated clearly and unambiguously
- All employees involved in handling personal data understand their responsibilities for following good data protection practice
- Training in data protection has been provided to all staff
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquires are handled effectively
- Regular reviews of procedures involving personal data are carried out
- Privacy by design is adopted for all new or changed systems and processes.

These actions will be reviewed on a regular basis as part of the management review process to ensure this policy remains relevant to the personal data processed.

4.10 Revisions

Simply Crown and Bridge are responsible for the maintenance and accuracy of this policy. Notice of any significant revisions shall be provided to all employees.