

# GDPR AUDIT FORM

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## What data do we at SANDPOOL collect?

All data collected from businesses and individuals is 3 fold.

Firstly data is collected as a result of direct incoming leads only from potential customers and suppliers, relating to advertising/commercial/corporate/events photography and film only, in line with the main business purposes of SANDPOOL.. This includes contact names, business addresses, email addresses, main telephone nr's, mobile nr's and job titles. Once customers confirm and request a contract/commission, TAX details, VAT details and bank details will be stored for invoice and HMRC purposes.

Secondly data is collected as a result of having to create entries in the used accounting and database system XERO, relating to invoices from suppliers, expenses and receipts. This data will only contain the business name and address in order to comply with yearly accounts submissions for TAX and VAT purposes only.

Thirdly data is collected as a result of work created in line with the main business purposes. This includes stills imagery and film footage, subsequent model release and usage info.

## Where do we store the data?

All written data is firstly stored within Xero software. Xero have embarked on a programme to identify which measures need to be implemented to be compliant with GDPR, and are working to implement them in time for 25 May 2018. More information regarding XERO's policies regarding GDPR can be found here:

<https://www.xero.com/uk/campaigns/xero-and-gdpr/>

Written data is secondly stored within Gmail, Apple Mail, Contacts and Calendars on iCloudDrive. Created documents are stored on a GSUITE business account, linked to 1 MacBook Pro only.

All imagery (still and video) will be supplied to the client for commission purposes. In line with the copyright act and licences to use agreements, all images are stored on external hard drives stored at a secure location at the companies address only.

All bank details are also stored within the METRO Online Banking website for SANDER JURKIEWICZ LTD saved forms if clients have paid invoices or suppliers have received income from SANDER JURKIEWICZ LTD.

## How do we protect and document the data we have?

Data within XERO, GSUITE, iCloud and METRO ONLINE BANKING are protected with industry-standard security technologies, employs strict policies to protect all data, and is leading the industry by adopting privacy-preserving technologies like end-to-end encryption for data. Full reports are available for extraction within the software mentioned above. For all new data collected going forward, all new entries will be added to the main database/accounting system Xero and logged with a point of origin. This new information will then be linked to GSUITE and iCloud for communication regarding commissions and new proposals as requested.

Data stored in external hard drives are stored in a secure place within the company address, not connected to any servers and or computers unless specifically required.

Only Sander and Dawn Jurkiewicz has access to ALL data and is the only data controller and responsible for ALL data held by SANDER JURKIEWICZ LTD.

**How long do we plan to keep the data for?**

A minimum of 6 years in line with HMRC guidelines in order to keep records.

**What is our function/reason for every piece of data we collect?**

All data collected is for commission reasons, copyright and HMRC and LTD company laws only.

Existing customers will be contacted when new proposals are created in line with the main business purposes and initial business enquiries.

A new privacy policy has been created to be added to our website and for future marketing purposes, fully compliant with new GDPR laws.

**What is the process if someone asks to be removed from our records?**

If at any point someone believes the information we process on them is incorrect, they can request to see this information and even have it corrected or deleted. They can do this via email by contacting Sander Jurkiewicz at [sander@sanderjurkiewicz.com](mailto:sander@sanderjurkiewicz.com)

If they are not satisfied with our response or believe we are processing their personal data not in accordance with the law, they can complain to the Information Commissioner's Office (ICO).