



CS Electronics [UK] Ltd Data Protection Policy December 2021

Introduction:

CS Electronics [UK] Ltd as a business is required to gather data and to use certain information about individuals.

These can and may include customers, suppliers, contacts, employees, and other people the company has a business relationship with or as a business is required to contact.

This policy statement details how personal data must be collected, handled and stored to meet our company's data protection standards – and comply with the law in place.

Why the policy exists:

This data protection policy statement ensures CS Electronics [UK] Ltd:

- ❖ Protects the rights of employees, customers and business partners.
- ❖ Complies with the data protection law and follows good practice.
- ❖ Protects the business from the continuous threat of a data breach.
- ❖ Is honest on how it stores and processes individuals data.

Data Protection Law

The Data Protection Act 1998 details how businesses – including CS Electronics [UK] Ltd; are to collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper, or by any other format/method.

Complying complicity with the law, personal information is to collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is determined by the following critical key principles. It is defined that personal data must be:



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- ❖ Not held for longer than it is deemed completely necessary.
- ❖ Obtained only for specific and lawful purposes/uses.

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- ❖ Processed in a fair and lawful manner.
- ❖ Must be totally accurate and updated accordingly.
- ❖ Used/processed in accordance with the rights for data subjects.
- ❖ Protected in a correct and relevant manner.
- ❖ Relevant and not excessive.
- ❖ Non transferrable outside the European Economic Area (EEA), unless that country or territory can provide ensure a high level of protection

The policy is strictly applied to:

- ❖ Owners, partners, directors and management of CS Electronics [UK] Ltd.
- ❖ Employees and representatives acting on behalf of CS Electronics [UK] Ltd including suppliers and sub contractors

It applies to all relevant information that the company holds relating to individuals, even if that information technically falls outside of the Data Protection Act 1998.

This can and may include:

- ❖ Names of employees/partners etc
- ❖ Postal addresses of the above.
- ❖ Email addresses of customers, suppliers, contacts etc.
- ❖ Telephone numbers.
- ❖ Including any other information relevant and relating to individuals.

Data Protection risks:

This policy is applied to protect CS Electronics [UK] Ltd from the threat of potentially dangerous data security risks which include:

- ❖ The reputational risk to the good name and standing of CS Electronics [UK] Ltd the company could suffer if hackers successfully gained access to sensitive data.
- ❖ Failing to offer choice. All individuals are free to choose how the company uses data relating to them.
- ❖ Confidentiality Breaches. Where information is or has been given out inappropriately.

Responsibilities of CS Electronics [UK] Ltd:

Director: Liane E Stübing-Exner
Registered in England & Wales: No. 6867496
Registered Office: 4 Bridle Ways, East Bridgford NG13 8PT
VAT No. 972225714
Bank Account: HSBC Bank plc. No. 74066782
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Directors, Managers, Employees and Representatives of CS Electronics [UK] Ltd have the responsibility for ensuring data is collected, stored and managed in accordance to this policy.

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Every department that is to handle the personal data must ensure that it is handled and processed in line with this policy and data protection principles.

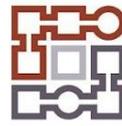
The following people listed have key areas of responsibility:

- ❖ The board of directors is responsible in complete entirety for ensuring that CS Electronics [UK] Ltd complies with all legal obligations.
- ❖ The named Managing Director of CS Electronics [UK] Ltd, Liane Stuebing-Exner, is responsible for:
- ❖ Keeping the board updated about data protection responsibilities, risks and issues.
- ❖ Reviewing all data protection procedures and related policies, in line with and to an agreed schedule.
- ❖ To arrange data protection training and advice for the people covered by this policy.
- ❖ To respond to any data protection questions from employees, partners, sub contractors and any other applicable associate of covered by this policy.
- ❖ Working with other employees/associates where deemed necessary to ensure marketing initiatives follow and adhere to data protection principles
- ❖ To check and approve where applicable, agreements and contracts with third parties that may access and handle the company's sensitive data.
- ❖ To address and respond to data protection queries from journalists or media outlets like newspapers.
- ❖ To address and respond to data protection statements attached to communications such as emails and letters.
- ❖ To address and respond to requests from individuals to access to *Subject Access Requests* held by CS Electronics [UK] Ltd.

The IT Department is solely responsible for:

- ❖ To perform regular checks, scans and updates to ensure security hardware and software is functioning to its full capabilities.

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- ❖ To evaluate any third-party services the company may be considering using to store or process data.
- ❖ That all systems, services and equipment used for storing data continuously meet the highest level of security standards.

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Staff Guidelines:

- ❖ CS Electronics [UK] Ltd is to provide training to all employees to help them understand their responsibilities when handling critical data.
- ❖ Employees already determined to be able to access data covered by this policy should be those who need it for their work.
- ❖ Employees are instructed to keep all data secure, by taking sensible precautions and following the guidelines stipulated.
- ❖ Data will be regularly reviewed and updated where applicable if is found to be outdated. It will be deleted and disposed of using safe methods if determined it is no longer required.
- ❖ Employees are to request assistance from their designated manager or the data protection officer if there are any uncertainties of any aspect of data protection.
- ❖ It is forbidden that data is shared informally. When and if access to confidential information is required, employees are to request access from their direct manager.
- ❖ Strong passwords are to be used and should never be shared.
- ❖ Personal data should not be disclosed to unauthorised people, either within the company or externally.

Data Storage

Procedures are in place as company policy to determine how and where data should be safely stored. Questions about storing data safely should be forwarded to the designated IT Manager.

If data is to be stored in paper format, it should be kept in a secure place where unauthorised people cannot see or have access to it.

The guidelines are applied to data that is usually stored electronically but have been printed out for whatever reason:

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- ❖ If not required, the paper or files should be kept in a locked drawer or filing cabinet and then disposed in accordance to company rules.
- ❖ Employees are to ensure that paper and printouts are not left where unauthorised people could see them, like on a printer.

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Data that is stored electronically must be protected from any form of unauthorised access, accidental deletion and potential malicious hacking attempts.

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- ❖ Data is protected by strong passwords that are to be changed regularly and the sharing of passwords is prohibited between employees.
- ❖ Data being stored on removable media (like a CD or DVD), is securely locked away when not being used.
- ❖ Data is only to be stored on designated drives and servers, only uploaded to an approved cloud computing service.
- ❖ Servers containing personal data are sited in a secure location and not located in general office space.
- ❖ Data is backed up frequently. Backups are tested regularly, in line with company procedures.
- ❖ Data is prohibited to be saved directly to laptops or other mobile devices like tablets or smartphones.
- ❖ Company servers and computers that contain data are to be protected by the approved security software and firewall.

Data Usage

The holding personal data that is determined to be of no value to CS Electronics [UK] Ltd unless it has been determined that the business can make use of it.

When personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- ❖ Employees are to lock their screens of their computers when left unattended if working with personal data.
- ❖ Personal data will not be shared informally and will never be sent by email, as this form of communication is not totally secure.
- ❖ Data to be encrypted before being transferred electronically.
- ❖ Personal data is not to be transferred outside of the EEA [European Economic Area].



- ❖ It is prohibited that employees save copies of personal data to the own computers.

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Data Accuracy

CS Electronics [UK] Ltd takes Data Accuracy seriously. The law stipulates that CS Electronics [UK] are to take then required actions to update where necessary data and that this is kept completely accurate at all times.

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It is deemed the responsibility of all CS Electronics [UK] Ltd employees who work with data are to take responsible steps to ensure it is kept as accurate and up to date as possible.

- ❖ Data will be held in as few places as necessary. Employees are prohibited in creating any unnecessary additional data sets.
- ❖ Employees are to take every opportunity to ensure data is updated by confirming a customer's details when they call.
- ❖ Data is to be updated as inaccuracies are discovered as standard daily procedure.

CS Electronics [UK] Ltd have simplified data subjects to update the information that the company holds about them.

Subject Access Requests

Individuals who are subject of personal data held by CS Electronics [UK] Ltd are entitled to:

- ❖ Determine information the company holds about them and the necessity of this information.
- ❖ Request to gain access.
- ❖ Kept informed on how to keep it up to date.
- ❖ Be informed how the company is meeting its data protection obligations.

If an individual contacts the company requesting this information, this is called a *SUBJECTS ACCESS REQUEST*

Subject access requests from individuals are to be made by email, addresses to the data controller at lynda.shepherd@cs-electronic-pcb.co.uk



The data controller may supply a standard request form, although individuals do not have to use this.

Individuals may be charged a charge per subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will verify the identity of anyone making subject access request before disclosing any information.

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Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, CS Electronics [UK] Ltd will disclose requested data. The data controller will determine if the request is legitimate, seeking assistance where necessary, from the board and from the company's legal adviser if required.

Providing Information

CS Electronics [UK] aims to ensure that all individuals are aware that their data is being processed, and that they understand:

- ❖ How the data is used
- ❖ How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

For any issues related to Data Protection GDPR Policy linked to this business please contact:



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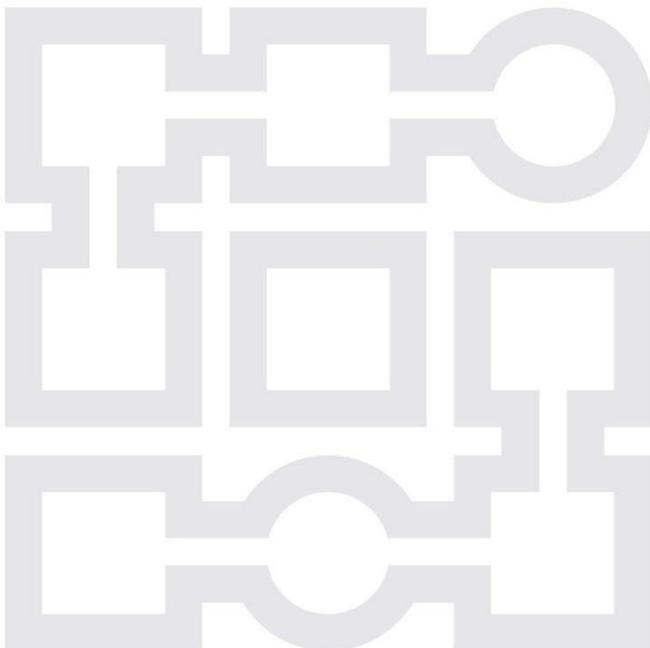
L . Shepherd

Lynda Shepherd.
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