



TGBN Ltd Review of Data Protection.

1. Policy

It is our policy to comply with all relevant legislation including the Data Protection Act and its successor, the General Data Protection Act. The following notes outline our approach to achieving compliance with the regulations.

It is based on guidance provided by The Information Commissioners Office.

Jane Mooney, Director, is the person responsible for ensuring that we comply with these regulations.

2. Information that we hold

We hold the following groups of data:

- Employee information
- Applications for employment
- Customer information (required to comply with the Packaging Regs)
- Customer information (required to operate the business)
- Supplier information
- Mailing lists for third parties

- In the course of our business, we may collect and process the personal data set out in the Schedule 1. This may include data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, business partners, HMRC).
- We will only process personal data for the specific purposes set out in the Schedule 1 or for any other purposes specifically permitted by the Act. We will notify those purposes to the data subject when we first collect the data or as soon as possible thereafter.
- We may also share personal data we hold with selected third parties for the purposes set out in the Schedule 1.

3. Privacy Notices

For each group above, we have prepared statements that explain what we will do with their information and their choices:



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- The legal basis for processing data.
- Data retention periods.
- The right to complain to the ICO

4. Individuals' rights

We will seek to respond to any request that relates to Data Protection within one working week. We explain the rights of individuals in our Privacy statements

5. Subject Access Requests

We will endeavour to supply any data requested within one week in a commonly used format such as PDF.

6. Lawful basis for processing personal data

Within the privacy statements, we identify why we hold the data. See schedule 2 below.

7. Consent

Most of the data that we hold is required to discharge legal duties or contracts. We do not need consent to hold this information.

We do however require consent to use personal data for discretionary activities such as marketing or mailing lists.

We maintain separate mailing lists to separate this data.

8. Children

We do not actively engage with children as we are a B2B organisation.

9. Data Breaches

The only data that we hold that is sensitive relates to employee personal data. This is held on secure IT systems or in secure cabinets in our secure office.

If a breach is suspected, we will investigate the breach with assistance from our retained IT consultants, and reported to the data subject & ICO if necessary, within 72 hours (as defined in the GDP Regs).

10. Data protection by design and by default

When we develop new systems we will implement the most appropriate tools available.



As part of this review we have identified who has access to the data, Schedule 3, the risks to the data we handle, Schedule 4 and the control measures in place in Schedule 5.

11. Data Protection Officers

As a B2B organisation that is not primarily involved in sensitive data, we do not consider it necessary to appoint a Data Protection Officer.

12. International

We have one employee based outside the UK. We take responsibility from the UK via the responsible person, Jane Mooney.

We do use a number of web based platforms that may operate outside the UK.

13. Disposal of data

When we dispose of records or equipment that may contain sensitive data, it will be done in a manner that reduces the risk of a data breach.



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