

Data Privacy Policy 2020

Cedar is committed to ensuring that any personal data you provide to us for processing is secure and handled in accordance with the Data Protection Act 1998, EU General Data Protection Regulation (2016/679) and in alignment with our Information Security Management System which is certified to the ISO 27001 standard. Your information is carefully protected from unauthorised or accidental disclosure or loss. We will ensure that the information you submit to us remains private, and is only used for the stated purpose.

Cedar greatly values the consent that you have given Cedar to store and process your personally identifiable data. We will ensure that your data is protected using "state of the art" technology. Initially this will consist of data encryption and two factor authorisation. These controls will be augmented to be commensurate with the threats to which the data may be subjected.

Cedar adopts the "privacy by design" principle in our systems and these are constantly reviewed and updated to ensure we continue to apply industry "best" security practices.

To comply with the "right to be forgotten", that was granted under GDPR, we will only hold personally identifiable information (PII) on our systems for as long as needed to meet the service you have requested. It will be securely deleted within 21 days, once confirmation has been received that the service has been met. Any paper copies not required by yourself or to comply with statutory requirements will be securely shredded using an accredited confidential waste disposal supplier.

Sensitive Personal Data is information, the unauthorised disclosure of which, could potentially seriously impact your personal life. Article 9 of GDPR specifically mentions in this category, political, religious or philosophical beliefs, sexual orientation or sex life, racial or ethnic origin, biometric data, medical or data concerning health. You must inform Cedar, if any of the data you wish us to process is in these categories. Processing is prohibited, unless one, or more, of the ten specific exemptions included in GDPR apply. We will need to discuss these exemptions with you. Sensitive Personal Data whilst it is in Cedar's possession will be subject to a heightened level of security (double encryption and or Pseudonymisation.)

All processing of data, undertaken within our secure Mailing Unit, is carried out by a specialist team. Personal data is only accessed by the staff who need to work on it and have been trained, screened and who have signed appropriate confidentiality agreements. Team members are assigned to ensure data processing activities are monitored for compliance to the documented controls and procedures. Should there be a security incident, all details are documented and investigated. Where any breach of personally identifiable information might have occurred, clients are notified within 24 hours.

Signed:



Tom Manser, Managing Director

Last reviewed September 2020