**About General Data Protection Regulation(GDPR)**

The GDPR is a European Union (EU) privacy law that will affect businesses around the world when it becomes enforceable on May 25, 2018. It regulates how any organization treats or uses the personal data of EU citizens, including organizations located outside of the EU. Personal data is any piece of data that, used alone or with other data, could identify a person. If you collect, change, transmit, erase, or otherwise use or store the personal data of EU citizens, you’ll need to comply with the GDPR. The GDPR will replace an older directive on data privacy, Directive 95/46/EC.

**Introduction**

Bar Red Limited needs to gather and use certain information about individuals. These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company’s data protection standards – and to comply with the law.

**Why this policy exists**

The data protection policy ensures Bar Red Limited:

* Complies with data protection law and follow good practice
* Protects the rights of staff, customers and partners
* Is open about how it stores and processes individual’s data
* Protects itself from the risks of data breach

**Data Protection Law**

The data protection Act 1998 describes how organisations – including Bar Red Limited – must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held of any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area(EEA), unless that the country or territory also ensures an adequate level of protection.

People, risks and responsibilities

**Policy Scope**

This policy applies to:

* The head office of Bar Red Limited
* All staff and volunteers of Bar Red Limited
* All contractors, supplies and other people working on behalf of Bar Red Limited

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998, This can include:

* Names of individuals
* Postal addresses
* Email addresses
* Telephone numbers
* Plus, other information relating to individuals

**Data Protection Risks**

This policy helps to protect Bar Red Limited form some very real data security risks, including:

* Breaches of confidentiality – for instance, information being given out inappropriately
* Failing to offer choice – for instance, all individuals show be free to choose how the company uses data relating to them.
* Reputational Damage – for instance, the company could suffer if hackers successfully gained access to sensitive data.

**Responsibilities**

Everyone who works for or with Bar Red Limited has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

* The Director is ultimately responsible for ensuring that Bar Red Limited meets its legal obligations.
* The IT Manager is responsible for:
	+ Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
	+ Performing regular checks and scans to ensure security hardware and software is functioning properly.
	+ Evaluating any third party services the company is considering using to store or process data, For instance, cloud computing services.
* The Marketing Manager is responsible for:
	+ Approving any data protection statements attached to communications such as emails and letters
	+ Addressing any data protection queries from journalists or media outlets like newspapers.
	+ Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

**General Staff Guidelines**

* The only person able to access data covered by this policy should be those who need it for their work
* Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
* Bar Red Limited will provide training to all employees that need it to help them understand their responsibilities when handling data.
* Employees should keep all data secure, by taking sensible precautions and follow the guidelines below.
* In particular, strong passwords must be used and they should never be shared
* Personal data should not be disclosed to unauthorised people, either within the company or externally.
* Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
* Employees should request help from their line manager or the data protection offices if they are unsure about any aspect of data protection

**Data Storage**

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT Manager or Data Controller.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

* When not required, the paper or files should be kept in a locked draw or filing cabinet
* Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer
* Data printouts should be shredded and disposed of securely when no longer required

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts.

* Firewalls, antivirus and malware protection are in place and regularly updated
* Data should be protected by strong passwords that are changed regularly and never shared between employees
* If data is stored on removable media (Like a CD, DVD or USB), these should be kept locked away securely when not being used
* Data should only be stored on designated drives and servers, and should be uploaded to a secured cloud computing service
* Servers containing personal data should be sited in a secure location, away from general office space
* Data should be backed up frequently. Those backups should be tested regularly, in line with the company’s standard backup procedure.
* Data should never be save directly to laptops, desktops or other mobile devices like tablets or smart phones

**Data Usage**

Personal data is of no value to Bar Red Limited unless the business can make use of it, however, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

* When working with personal data, employees should ensure the screens of their computers are always locked when left unattended
* Personal data should not be shared informally. In particular, it should never be sent by email under unsecure protocols, as this form of communication is not secure.
* Data must be encrypted before being transferred electronically. The IT Manager can explain how to send data to authorised external contacts.
* Personal data should never be transferred outside of the Europeans Economic Area(EEA)
* Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data

**Data Accuracy**

The law requires Bar Red Limited to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Bar Red Limited should put in ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

* Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets
* Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer’s details when they call
* Bar Red Limited will make it easy for data subjects to update the information Bar Red Limited holds about them. For instance, via the company website.
* Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on the stored telephone number, it should be removed from the database.
* It is the marketing manager’s responsibility to ensure marketing databases are checked against industry suppression files every six months.

**Subject Access Requests**

All individuals who are the subject of personal data held by Bar Red Limited are entitled to:

* Ask what information the company holds about them and why
* Ask how to gain access to it
* Be informed 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 the information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at **stuart@bar-red.biz**

This site provides a data request form and can be viewed [**here**](https://bar-red.biz/data-access-request/)

The data controller will always verify the identity of anyone make a subject access request before handing over any information.

**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, Bar Red Limited will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company’s legal advisers where necessary.

**Providing Information**

Bar Red Limited aims to ensure the individuals are aware that their data is being processed, and that they understand:

* How the data is being 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.

This is available on request. A version of this statement is also available on the company’s website.

**Privacy Policy**

Registered Office:

**Bar Red(Briton Ferry Athletic Football Ground)**

**Old Rd, Briton Ferry, Neath, SA11 2BU.**

Tel: 01639 821925 or 07515 405025

At Bar Red Limited we are committed to protecting your privacy & security. Please read our Privacy Policy carefully so that you are aware of the steps we take to protect your privacy, what information we collect and how we use it now or may use it in the future via The Bar Red Limited website.

**Controllers of Information**

Any personal information provided to or gathered by our website is controlled by Bar Red Limited, Bar Red(Briton Ferry Athletic Football Ground) Old Rd, Briton Ferry, Neath, SA11 2BU.

Details of the current Data Protection Officer at Bar Red Limited can be obtained by emailing **stuart@bar-red.biz**

**What information do we collect & how do we use it?**

When you order over our website we need to know your name, e-mail address and delivery address. This allows us to process and fulfil your orders and to notify you of the status of your order. You will find that it is not compulsory to provide us with any additional information we request which is not necessary or reasonable in order to complete your transaction. We also ask for your telephone number which enables us to contact you urgently if there is a problem with your booking.

When you register on the website or, during the process of booking from the website and choose to receive further information from us, we may use the information you provide us with for the following purposes:

We monitor customer traffic patterns and site usage to help us to develop the design and layout of the website.

Personal details may be for purposes such as notifying you of Bar Red Limited news, events, giveaways and offers which we think may be of interest to you.

Bar Red Limited will not put any information about you on general release nor will it sell such information. Personal data will not be transferred outside of the European Economic Area. We employ other companies and individuals to perform functions on our behalf such as analysing data, providing marketing assistance, processing credit card payments and designing and operating our website. Such companies and individuals have access to your personal information for the purpose of carrying out this work only. These enterprises will not use your data for any other purpose. Under no circumstances will these enterprises use any additional data about you to which they are party for any other purposes.

**EU Cookie Directive**

From 26 May 2011 a new European Union directive requires us to gain the consent of our users to download cookies on to their machines. There are various methods we could use to gain users consent. For example, we could use pop-ups; prompting users to tick a box to confirm they give permission for us to download cookies on their machine.

Alternatively, we could use an online form that all users must complete before using the website.

We consider both of these solutions as obtrusive. We want our users find information and services quickly.

Therefore, we have taken the decision to promote how we use cookies on our website instead. This will enable users to make an informed decision whether they want to disable this feature.

There are links on our terms and conditions and disclaimer pages which are in the footer of every web page pointing to this information.

**What is a Cookie?**

Information may be sent to your computer in the form of an Internet “cookie” to allow our servers to monitor your requirements. The cookie is stored on your computer. Our server may request that your computer return a cookie to it.

These return cookies do not contain any information supplied by you or any personally identifiable information about you. However, we use cookies to keep track of your shopping cart when you are using the Bar Red Limited Online.

Such measures are necessary to allow Bar Red Limited to measure the usability of the systems, which will help to continually improve user experience of our websites. Your browser software should however enable you to block cookies if you wish to. For more information about cookies, please visit http://www.allaboutcookies.org/.

**Strictly necessary cookies**

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.

**Performance cookies**

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don’t collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

**Functionality cookies**

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located.

These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

**Google Analytics**

Bar Red uses Google Analytics, a web analytics service provided by Google. Google Analytics collects first party cookies, which are text files placed on your computer to collect standard internet log information and visitor behaviour. This information is sent to Google and is used to evaluate how our website is being used. This enables Bar Red Limited to compile statistical reports. A full list of cookies used by Google Analytics and explanations on how these work is available on the Google code website.

Bar Red Limited does not collect (nor allow any third party to collect) personally identifiable information of visitors to our site. We will not associate any data gathered with any personally identifying information. We will not link or seek to link an IP address with the identity of a computer user. In short, Google Analytics doesn’t identify who you are, but it does track your movements on our websites.

**How to disable cookies**

You can stop cookies being downloaded on to your computer by selecting the appropriate settings on your browser. However please note that if you do this you may not be able to use the full functionality of this website.

There is more information about cookies, including how to delete them on the website aboutcookies.org. You may also opt out of being tracked by Google Analytics.

**Consent**

By using our website, you consent to collection and use of any information you provide to us by Bar Red Limited for the purposes described above. If we amend our privacy policy, any changes will be published on this web site. If at any time you wish to update the information which we hold about you, or if you wish to stop receiving information from Bar Red Limited, please contact us.

**Disclaimer**

Bar Red Limited recognizes that we have legal obligations in terms of the collection and use of personal data made available to us. This website is provided on an “AS IS” basis and Bar Red Limited excludes all warranties or representations of any kind with respect to this website or its contents. In particular, Bar Red Limited does not warrant or represent that the information contained on this website is accurate or up to date.

The contents of this website are designed to comply with English Law. You may be viewing the website in a market in which we do not commonly sell our goods. Bar Red Limited cannot be held responsible for non-compliance with any local advertising or other laws in relation to this website or its contents.

**Your consent**

By using our website, you consent to collection and use of any information you provide to us by Bar Red Limited for the purposes described above. If we decide to change our privacy policy, we will post those changes on this page. We recommend you re-visit this page periodically to check for changes. We endeavour to take all reasonable steps to protect your personal data including the use of encryption technology, but cannot guarantee the security of any data you disclose online. You accept the inherent security implications of sending information over the Internet and will not hold us responsible for any breach of security unless we have been negligent.

If you are under the age of 18 you may register on the website to receive newsletters and other information but only with parental or guardian consent. You may only make purchases on this website if you are aged 18 or over or, if under 18, have received parental or guardian consent.