We are ready for GDPR are you?

25th May 2018 marks the date on which new EU General Data Protection Regulation (GDPR) will be enforced in the UK. This regulation will be incorporated into the Data Protection Act 2018. The Privacy and Electronic Communications Regulations (PECR) will remain unchanged.

The PECR directive itself is also due to be replaced by a new regulation that will impact electronic communications such as cookies, social media, email and VOIP services. This may apply as early as 2019.

All of these changes to the Data protection regulatory landscape require careful consideration ensuring that policies and procedures are in place for holding and processing personal data including Customer, Prospect, Citizen and Staff Data.

Latcham Direct processes data for a great many organisations, all of which is managed and hosted within our secure data centre in Bristol.

The team at Latcham Direct and Latcham CGL has been working with the DMA and with our legal advisers to prepare for GDPR, ensuring that we comply with the law and best practice, to deliver compliant marketing and document fulfilment solutions for our customers.

This leaflet is designed to provide an overview of our services and the security measures we have put in place. The Latcham team has received GDPR training and are ready to provide advice and support to help you.

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Data Security at Latcham

Latcham Direct and Latcham CGL are already trusted to deliver secure print, fulfilment, and marketing services across many sectors.

Even before GDPR was in its draft stage, we were investing in strong physical, IT and data security to ensure that we comply with the strict data security requirements and regulatory environments within financial services, local and national government and the NHS.

Without doubt, we are one of the most secure print and fulfilment specialists in the UK.

- We have implemented and externally audit ISO/IEC 27001 (Information Security Management Systems) accreditation which we've held since 2010

- We have achieved NHS Information Governance Statement of Compliance (IGSoC)

- We are recognised as a CESG CLAS supplier with The National Cyber Security Centre, the Information Assurance arm of the Government Communication Head Quarters, (GCHQ)

- Latcham is an accredited APACS (C&CCC) security printer, providing customers with the assurance that all processes, from origination to delivery occurs within a secure production facility

All procedures are managed, documented and audited under the terms of ISO 270001 accredited Security Management System.

In light of GDPR, we're working towards the implementation of the British standard – BS10012:2017. This is a Personal Information Management System which provides an additional framework for managing the processing of personal data, focusing on privacy and aligned with GDPR.

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Site Security

The majority of data and personalised print is fulfilled from our secure data processing, warehousing and production facility in Bristol.

The Bristol site is monitored by a sophisticated CCTV system and protected by security alarm systems. When closed the site is protected by external and internal monitored CCTV with a rapid man response team in place. All entrances have card swipe access and turnstiles, with additional card swipe and PIN access to secure areas within the facility. The perimeter is protected by a secure 7ft steel fence and monitored in all areas by external and internal security cameras. In addition, our 'strong room' facilities are available for the secure storage of cheques, vouchers, certificates and other sensitive documents.

The Latcham fulfilment unit is equipped to handle high security print in a further restricted access production area, managed and operated only by authorised personnel. This guarantees that even the most sensitive data can be stored and processed within a fully secure environment.

All personnel are vetted at the time of employment and we collect references from previous employers. CRB checks are carried out on all employees and self-disclosure forms are completed as part of our 'Security' procedures. Annual 'Security Awareness' training is carried out, during which all employees are given updates on Data Protection changes.

Latcham has a strong history of delivering secure and sensitive customer communications to a number of other major blue chip organisations, many of whom have conducted their own, independent security audits.

Secure Data Processing, IT & Storage

Latcham recognises its responsibility as a Data Processor and the sensitivity and confidential nature of customer's data held either within IT systems or via printed documents.

We have a secure, on site, Data Processing and storage facility which is segregated both physically and virtually and is protected by additional robust security systems and procedures.

Access to our IT systems is continually monitored and controlled including the use of firewalls, malware/virus detection. We also monitor individual user names and passwords, use of network segregation across the site & IT environments and the use of separate data storage facilities for sensitive data.

Latcham provides a range of secure methods for transferring data to and from our secure data centre. The recommended method is Secure File Transfer Protocol (SFTP) using file encryption. However we can work closely with our customers IT and Security teams to scope and implement more integrated solutions if necessary.

Data Integrity

Data integrity is paramount. Each and every personal record has to be accurate and it also needs to be accounted for throughout all stages of the production and mailing process.

At Latcham we have invested in developing control procedures and systems that allow us to achieve 100% data integrity using in-line bar codes and OCR scanning facilities that scan individual pages and completed packs to ensure that there is nothing missing and that there are no duplicates.

The data processing, personalisation, production and mailing processes can be fully auditable. Job information is verified at completion of individual production processes and spoils are re-submitted for processing.

We have been the subject of security inspections and audits for several large financial institutions and government bodies and have been rated at the highest level possible - equivalent in one case to their own company premises.

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Housekeeping, Deletion and Destruction of Data

All information, in any format and from any location, must have due regard to confidentiality of our employees, clients and customers.

A record of all data is recorded in a structured management system which identifies when data was received, what is currently being stored and when it is due for erasure.

The Data Processing team has a process for reviewing stored data and will only hold data for the time it is required to fulfil the particular applications or contract. Typically data is erased within 2 weeks following completion of each job.

Longer term archiving and storage solutions are available using our sophisticated Digital Document Archiving services.

Secure Waste Management

Personalised printed documents are treated as Confidential or Sensitive Waste and is shredded within our on-site shredding facilities.

All sensitive office and production waste is segregated and collected within 'blue' locked security waste bins. It is then taken directly to the shredding facilities which are operated by staff that have the appropriate training and security clearance.

All IT equipment is documented within our asset register and procedures are in place for the destruction of Confidential or Sensitive IT Waste on electronic media such as tape, disc, cassette/cartridge, hard drives, CD-ROM, DVD and ZIP drive.

Before disposal of devices or servers or equipment, we will remove the physical hard drive and they will be erased using approved hard disc erasing software.

CONFIDENTIAL
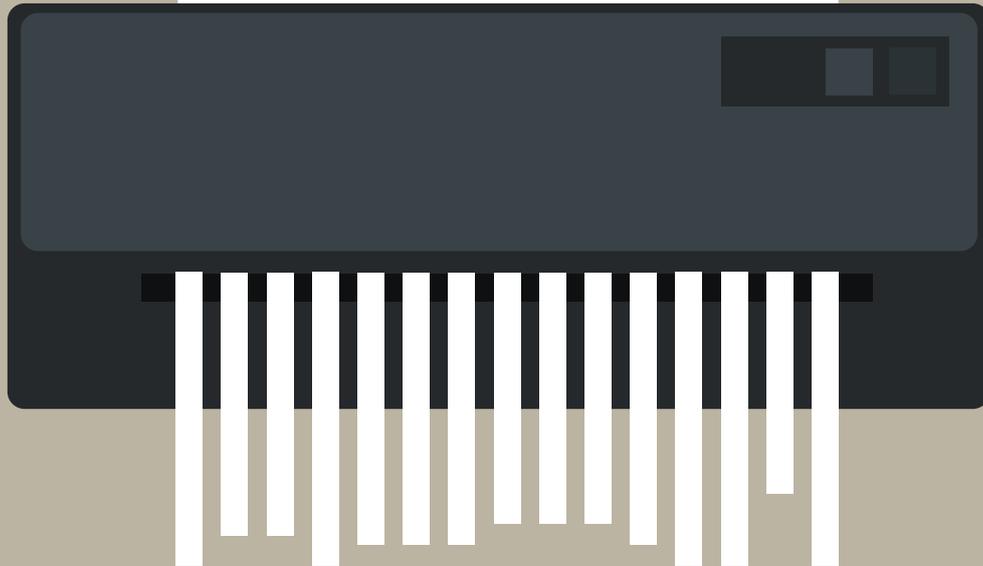
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Data Cleansing & Suppression Management

Our team of experts has many years' experience of providing a wide range of data services to clean, standardise, de-dupe and pre-sort, enhance and suppress records within customer databases, having invested in industry leading software solutions.

We recommend that data is checked against various national suppression registers, such as the Postal, Telephone Fundraising Preference Services, and mortality suppression files.

GDPR will require that you also maintain and suppress all those people who have opted-out of future communications and we can ensure this is applied to every campaign.

Consent Management

You should review how you seek, record and manage consent and whether you need to make any changes. Refresh existing consents now if they don't meet the GDPR standard, checking they have not already opted-out of marketing communications.

Organisations may need to demonstrate that they have the necessary consent for processing and using data for direct marketing and fulfilment applications, to comply both with the Data Processing Act 2018, GDPR and the Privacy and Electronic Communications Regulations.

Organisations will need to be able to demonstrate within their marketing campaigns, the reason why personal data is being processed and for this to be clearly set-out in a privacy statement. There is also an obligation to provide a method for people to change their preferences, or to opt-out from future communications altogether.

Latcham can provide the expertise and technology to manage preferences to ensure that your organisation is GDPR ready using sophisticated consent management tools.

Subject Access Requests Fulfilment

GDPR legislates that organisations should respond to Subject Access Requests within a 30 day period (commencing from the day after the action takes place). Therefore there is a requirement to be able to provide the data subject details of the personal data which is being stored on them and for what purpose it is stored. Latcham has integrated Digital Document Archiving solutions and customer portals into our processes which allow all documents to be stored and then accessed, subject to appropriate access controls of course, at a future date. Our solutions can integrate with multiple platforms to capture disparate data & documents and organise them in a 'single customer view', thus providing a method for automating the fulfilment of Subject Access Requests.

GDPR Advice and Consultancy

Latcham can advise on all aspects of GDPR in relation to direct marketing campaigns and document fulfilment solutions.

Our sales and client services teams have received GDPR training and are on hand to help during every stage of your campaign planning and execution.

We are not legal advisors however we can refer you to experts in GDPR, Security and the law should this be required.

How do I contact you if I need more information?

If you would like any more information please do contact a member of the Latcham team on 0117 311 8200 email marketing@latchamdirect.co.uk or visit our website www.latchamdirect.co.uk You can also follow us on Twitter @LatchamUK

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CONTACT US

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