

DATA PROTECTION



Here at Bonacia your privacy is our priority, especially as a lot of our brands deal with the personal data of children. This document shows how we protect your data.

As part of your responsibilities you have to make sure that any company that processes data that you control, adheres to the GDPR. To make life easier for you all the information you need to know about how we look after your data is below. You can print this off, have a read, file it away and relax knowing that your data is in safe hands.

THE FORMAL BITS:

Company: Bonacia Ltd

Company number: 05368980

Brands in the Bonacia Family

- Young Writers
- Leavers' Books
- Nursery Leavers Books
- Nursery Resources
- School Products
- Book Printing UK

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Data Protection registration number: ZA230462

Number of employees: 100

MAIN PURPOSE FOR PROCESSING YOUR DATA

	The Young Writers team process teachers' data when entering competitions; this is usually their name and their email address. They also process pupils' names when editing and typing their amazing poems and stories. We promise this data will NEVER be shared!
	Leavers' Books process teachers' names and email addresses. They also process pictures and names of children that will appear in the yearbooks. We guarantee the safety of your data and all processing takes place in our building. There are no third parties to worry about.
	When creating your leavers' hoodies we process teachers' names and email addresses but also (if you are going to personalise with names) we process the names of pupils as well. We outsource some of the work to a company called Yazoo Clothing who print the finished garments for you, however we have made sure that they care about your data as much as we do and are GDPR compliant.
	Our Nursery Resources department process the name, address and email address of the person who places the order. These details are not shared with any third parties.
	The main information the School Products team process is the teacher's name and email address. If you are choosing to have a photo on your product this is also classed as personal information which is printed in house and not shared with any other companies.
	The BPUK team deal with orders for print from schools, publishers and individuals. The data they process is the name, email and postal address of the person placing the order or getting the quote. They may occasionally share information with a company called Baird's who can print larger runs but you will always be asked permission for us to share this. We have also scoped them out to make sure they are compliant with GDPR.

TECHNICAL STORAGE INFORMATION

All personal data is held within Bonacia's secure network which uses per user based access control.

Each brand within Bonacia has its own dedicated folder structure, which ensures that only those Bonacia employees that need to see any personal information can.

In the few cases listed above, where it is necessary to share personal data outside of Bonacia, we transfer this information using a password protected and encrypted Zip file sent using 'We Transfer' and the passwords are given to the recipient verbally via telephone. We never send any personal data via email or in an unencrypted form.

We also require any contracts with third parties that we share data with to contain clauses confirming their compliance with our Privacy Policy and for us to audit them at any time to confirm this.

So that's the basics of why and how we process your data – we look after it and we don't share... unless we really have to and we make sure any partner we have is 100% as careful as we are.

OVERVIEW Q AND A

Will all our data be held at your business address?

We do everything under just the one roof (impressive we know) so all your data is looked after at Remus House.

Do you use the illusive 'Cloud' to store data or backups, if so how do you keep it safe?

We use Netgear and Amazon platforms for this, they are very reputable companies and know what they are doing. All data is encrypted using 128 bit SSL secure connection for transmission and 256 bit AES encryption for the physical data.

All data also hides behind firewalls and are password protected.

Do you collect data from individuals on our behalf? If so how do you use it and will it be shared?

The only brand that process data on your behalf is Book Printing UK when they are offering a fulfilment service but you can rest assured we don't share this and look after the data as if it were our own.

All other brands do not.

If individual parents place orders with us (either through Young Writers or the Leavers' Books Parent Payment Portal) this opens a relationship with us. We have privacy policies for this and the only time we will use their data is relating to their order – and of course we'd never share this.

PREMISES SECURITY Q AND A

Do you have a reception area? If it is how is it controlled?

We have a reception area which is manned at all times.

And can any prying eyes see into the office from here?

They can see staff hard at work but we have a clear desk policy and make sure that all computer screens cannot be seen from the area.

Do you have any other entrances? If you do how are these controlled?

We have fire exits which remain closed and are at the back of the premises which cannot be opened from the outside.

Do staff wear identification?

Not at the moment – although we are a close bunch and we know who should be where and when.

Do visitors wear identification?

Most certainly, they have lanyards which clearly identify them as a visitor. They also have to sign in to the visitor's log so we know they are here and when they have left.

Do you have an alarm system, is it linked to anyone?

Our premises are alarmed with posh motion sensors. At the first sign of trouble we get a call from Darden Security and they send someone straight here to make sure nothing untoward is happening.

Do you have windows and how are they secured?

We have lots of windows here at Remus House. All windows on the bottom floor where our production facility is have window locks, they also have a protective film over them to make them harder to look through and very hard to smash.

Our offices are based on the top two floors where the windows are fitted mainly with blinds and also the special film we use on the bottom floor.

Do you have any further security?

We have 24 hour CCTV around the premises and signs to let everyone know.

Staff and procedures Q and A

How do you make all staff aware of their responsibilities under the Data Protection Law?

Although most data protection is common sense we make it common practice. When we welcome new people into the Bonacia Family Data Protection is part of the induction. They get taken through the do's and don'ts of data protection and once they're happy they know what they are doing they sign to this effect.

With the introduction of GDPR we have overhauled our training on this and have added it as a programme to our in house training academy for further training.

How do you make sure your staff are responsible and reliable?

We ask for full references and check these before we employ anyone.

Also as of this month every member of the Bonacia has been DBS checked... from the directors and senior managers to the lads and ladies in the print shop – so you really know your data is in great hands.

Do you have a Data Protection or Information Security Policy in place?

Do we ever, we have lots! We look after a lot of data for various different brands so each team have their own policy which is super relevant to how they work. And as a business we have policies that apply to all departments, mainly IT and email related.

Do you have a BYOD (Bring your own device policy)?

We do not have one of these and have no plans to introduce one.

What would happen to a member of staff if they breached Data Protection?

We take Data Protection very seriously, we focus on training and procedures to ensure this doesn't happen. Just in case we do have an internal procedure for data protection breaches and everyone in the building knows that breaching data protection could result in disciplinary action.

Do you use any sub contractors to process data? If so do you have any safeguards?

We don't... we like to do things ourselves! Like the saying goes if you want something doing properly, do it yourself!

OTHER SAFEGUARDS Q AND A

Do you restrict staff in what information they can access?

Certainly, although we trust our staff implicitly we think it makes things a little neater – employees only have access to the information on the database they need to do their job to the best of their ability.

How about data on other media - USB, DVD and paper?

Any data stored on USB is transferred to our secure network, then the data is deleted from the USB. We do not use DVDs to store data.

Each department has their own office so access is restricted for paper documents, also paper is securely shredded.

DISPOSAL Q AND A

How is paper with personal data safely and securely disposed of?

We have secure shredding bins in the office, these are locked and secure at all times. They are picked up monthly and shredded off site. Don't panic though the vans are well protected with CCTV and we get a pick up note and confirmation when all our waste has been securely destroyed.

How do you safely and securely dispose of hardware and software which may include personal data?

Obsolete data drives are formatted (which means data is removed) before being disposed of.

If you store data in the Cloud, how do you ensure this is done safely?

Processes and protocols are in place for data removal from Cloud storage, managed by our technology manager in conjunction with Amazon and Netgear who protect our data.

So there you have an overview of how we protect your data, which satisfies your responsibility to make sure we are compliant. You can now relax and know your data is in safe hands. If you would like any further information on our processes and policies you can by all means contact us or check out individual privacy policies on each of the brands' websites.

For more information on the GDPR regulations and making sure you are internally compliant we recommend looking at the Information Commissioner's Office at www.ico.org.uk or if you have any questions our friends at Xynics are GDPR gurus and super helpful, you can speak to Mike by emailing mike.kilby@xynics.com

