



# Janus Digital Enterprises Limited

## Privacy Policy

Last updated	07/03/2020 by Nathan Drew v1.0
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### Definitions

<b>JDEL</b>	Means 'Janus Digital Enterprises Limited', a registered UK business with ICO. Company number 12157155.
<b>GDPR</b>	Means the 'General Data Protection Regulation'.
<b>Responsible Person</b>	Means Mr Nathan Drew who is registered as the Data Protection Officer (DPO).
<b>Register of Systems</b>	Means a register of all systems or contexts in which personal data is processed by the JDEL and brands/subsidiaries of JDEL.

### Table of Contents

<b>Definitions .....</b>	<b>1</b>
<b>1. Data protection principles .....</b>	<b>2</b>
<b>2. General provisions .....</b>	<b>2</b>
<b>3. Lawful, fair and transparent processing .....</b>	<b>2</b>
<b>4. Lawful purposes .....</b>	<b>2</b>
<b>5. Data minimisation .....</b>	<b>3</b>
<b>6. Accuracy .....</b>	<b>3</b>
<b>7. Data generation and usage .....</b>	<b>3</b>
<b>8. Archiving / removal .....</b>	<b>4</b>
<b>9. Security .....</b>	<b>4</b>
<b>10. Breach .....</b>	<b>4</b>

## 1. Data protection principles

JDEL is committed to processing data in accordance with its responsibilities under the GDPR and is registered with the Information Commissioners Office (ICO) under the Janus Digital Enterprises Limited Group. Should you need to contact us please send an email to [DPO@janusdigital.co.uk](mailto:DPO@janusdigital.co.uk)

JDEL will ensure it complies with Article 5 of the GDPR, which requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## 2. General provisions

- a. This policy applies to all personal data processed by JDEL.
- b. The Responsible Person shall take responsibility for JDEL's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually by the Responsible Person.
- d. JDEL is registered with the Information Commissioner's Office as an organisation that processes personal data.

## 3. Lawful, fair and transparent processing

- a. To ensure processing of data is lawful, fair and transparent, JDEL shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually by the Responsible Person.
- c. Individuals have the right to access their personal data and any such requests made to JDEL shall be dealt with in a timely manner.

## 4. Lawful purposes

- a. All data processed by JDEL will be done on one of the following lawful bases: consent, contract,

legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).

- b. JDEL shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where an individual wishes to revoke consent for their personal data, an email requesting such may be sent at any time to [DPO@janusdigital.co.uk](mailto:DPO@janusdigital.co.uk).

## 5. Data minimisation

- a. JDEL shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## 6. Accuracy

- a. JDEL shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up-to-date.

## 7. Individuals Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights below please contact us at [dpo@janusdigital.co.uk](mailto:dpo@janusdigital.co.uk)

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

## 8. Data generation and usage

- a. For reasons outlined in section 4(a), JDEL collect data from users and customers of JDEL and its brands/subsidiaries. Data gathering will always be minimal and proportionate.
- b. The details of data generation, its lawful basis and its intended use will be described in general terms and conditions specific for each brand or subsidiary business of JDEL as applicable. These should always be read in conjunction with this Data Protection Policy.

## 9. Retention and disposal

- a. To ensure that personal data is kept for no longer than necessary, JDEL shall put in place a retention schedule for each area in which personal data is processed and review this schedule annually.
- b. The retention schedule will consider what data should/must be retained, for how long, and why.

## 10. Security

- a. JDEL shall ensure that personal data is stored securely using modern software that is kept up-to-date.
- b. Access to personal data shall be limited to personnel who require it and appropriate security will be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this shall be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## 11. Breach

- a. In the event of a breach of security leading to the accidental or unlawful destruction; loss; alteration; unauthorised disclosure of; or access to personal data, JDEL shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY