

Data protection policy

This policy provides an overview of our approach to data security and our compliance with data protection legislation, including the General Data Protection Regulation (GDPR), in our capacity as a data processor.

Introduction

Wordshop is registered with the Information Commissioner's Office Registration Number: Z8318926 Security Number: 10504533

Wordshop is committed to high standards of information security, privacy and transparency. We place a high priority on protecting and managing data in accordance with accepted standards including ISO 27001 and ISO 9001.

Wordshop has integrated ISO controls into its operating procedures. These procedures span the organisation, teams or functions that provide service or support to our clients. The key components of our ISO controls are:

- Corporate Governance: how we provide oversight of our business and people;
- Change Management: how we make sure changes are tracked and properly reviewed;
- Access Control and Management: who has access to our systems and how this access is managed;
- Data Redundancy and Backup: how data is kept safe and stored in the event of adversity;
- Systems Architecture and Hardening: standard set-up controls and system hardening for all of our systems.

Wordshop's Information Security Manager will inform, advise and monitor compliance. The company will implement tools as appropriate that support the process, provide necessary security and ongoing delivery of objectives.

Data processing

- All of our staff and approved sub-contractors are familiar with GDPR and their personal responsibilities.
- All staff are trained on induction and every two years (or sooner if there is a major change in legislation).
- All data is adequately segregated and access is restricted on a need to know basis.
- Data is only processed to the extent required and on direct instructions from the data controller.
- Records of all data processing are kept and made available to the data controller on request.
- All systems that handle personal data are fully encrypted and password protected.
- Adequate security measures are enabled to protect personal data from loss or corruption.
- No personal data is transferred outside of the EU.
- All relevant parties would be notified of any breach or potential breach.

Wordshop has adopted the following objectives, which underpin our approach to data protection:

- Information will be protected in line with all relevant Wordshop policies and legislation, notably those relating to GDPR and data protection;
- Information will be made available solely to those who have a legitimate need for access;
- All information will be classified according to an appropriate level of security;
- The integrity of information will be maintained;
- The processing will be lawful, fair and transparent;
- Data will only be used for a specific purpose;
- Information will be protected against unauthorised access;
- Data is not kept for longer than necessary;
- Compliance with our Information Security policy will be enforced.

Security measures

We implement and maintain appropriate technical and organisational measures to protect Customer Data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access. These include, at a minimum:

- Ensuring any of our employees or agents or other persons to whom we provide access to Customer Data are obliged to keep it confidential;
- The use of pseudonymisation and encryption of Customer Data where appropriate;
- Measures to ensure the ongoing confidentiality, integrity, availability and resilience of our systems and services;
- The ability to restore the availability and access to Customer Data in a timely manner in the event of a physical or technical incident;
- A process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing of Customer Data.

Governance

All organisational measures in place are reviewed at least annually and amended and adjusted as needed. Our ISO 27001 and ISO 9001 are independently audited, assessed and accredited and each of the documents constituting the overarching Information Security Policy are reviewed annually. The Information Security Policy along with its sub-policies provides the operational framework we use to manage data protection compliance.

Changes or additions to the Information Security Policy may be proposed by any member of staff to the Information Security Manager. Any substantive changes made to any of the documents in the set is communicated to all relevant personnel.

Information Security Manager – Giles Powell-Smith

Internal Auditor – Nina Ashby

Information Security Officer – Luke Whitchurch