

## Approach to GDPR



# Approach to GDPR - Your Questions Answered

## 1. What is GDPR?

GDPR stands for General Data Protection Regulation. It is EU legislation aimed at unifying the approach to data protection across all EU member states in order to protect individuals from improper use of their personal data by organisations.

## 2. Will GDPR still apply after Brexit?

Yes. It is the intention of the UK government to still adhere to EU policies with regards to data protection after the UK leaves the EU.

## 3. Who is responsible for my data at CB Reid?

In short, all of CB Reid's staff are responsible for the safety of your data and have been trained to ensure they are up-to-date with the requirements of GDPR. CB Reid has also appointed Matt Haines (Director) as its Data Protection Point of Contact in order to take a single approach to its responsibilities for data protection. Matt can be contacted on 01305 215800 or via [mhaines@cbreid.co.uk](mailto:mhaines@cbreid.co.uk) should you wish to discuss any aspect of GDPR or data protection generally.

## 4. How is CB Reid keeping my personal data safe?

CB Reid embraced a paperless method of working several years ago which centred around an electronic document approval system. Clients already using this system will be familiar with the online app through which they have created an account with their own user credentials. This system is compliant with GDPR legislation and is more secure than email communications.

Our back office IT system is hosted on encrypted servers located in the EEA (a requirement for GDPR). Our IT service provider is compliant with GDPR and, in the unlikely event of a data breach, has robust systems in place for its detection and management.

Where we use separate systems outside of our IT platform (such as cloud-based systems) we have ensured their compliance with GDPR and their over-all security. Internal policies cover the use of passwords, password protection and frequency of expiration.

CB Reid has staff policies in place covering the use of client information on laptops and other mobile devices to ensure the safety of client data.

## 5. Where can I view CB Reid's privacy policy?

This is available on our website at [www.cbreid.co.uk/privacy](http://www.cbreid.co.uk/privacy)

## 6. What if I correspond with CB Reid via the postal system?

CB Reid marks information sent in the post as "private and confidential". The UK postal laws are otherwise considered compliant with GDPR.

## 7. I send information to you via email, is this still possible?

Email is a convenient yet unsecure method of communication so we would urge clients to exercise common sense in terms of the information which is transmitted this way. For sensitive information or large files we can provide access to a document transfer portal.

## 8. I use a cloud accounting system to keep my records, is this ok?

Cloud accounting service providers have each had to comply with the terms of GDPR and should have contacted you to explain their approach. If you have any concerns you should contact your software provider directly.

**9. CB Reid process my payroll, is my employees' data safe?**

CB Reid has long been using password protection on payroll information delivered by email but is working to make this process more robust by moving to a separate portal system for employees and clients to access with their own user credentials to view payslips and supporting information. Clients and employees currently receiving this information in the post will be able to continue to do so.

Where clients' employees have queries regarding the safety of their data and how we ensure its safety they can access our privacy policy at [www.cbreid.co.uk/privacy](http://www.cbreid.co.uk/privacy) or contact Matt Haines (Data Protection Point of Contact) directly on 01305 215800 or [mhaines@cbreid.co.uk](mailto:mhaines@cbreid.co.uk).

**10. Is my current engagement letter still appropriate given these changes?**

Client engagement letters are largely unaffected but our terms of business have been amended to reflect the new legislation. We will be issuing a new engagement letter and terms of business document to each client over the 12 month period from 25 May 2018.

**11. CB Reid send me regular newsletters via email ,will this continue?**

Yes. Our responsibilities in respect of our communications with you are covered by our terms of business. However, if you do wish to opt out from receiving these you can do so by clicking the appropriate link in any of our newsletters or by contacting Matt Haines (Data Protection Point of Contact) on 01305 215800 or at [mhaines@cbreid.co.uk](mailto:mhaines@cbreid.co.uk).

**12. How long will CB Reid keep my data for?**

For current clients, we will keep data for at least as long as is necessary for you to fulfil your statutory obligations. Items of a permanent nature will be kept indefinitely whilst you remain a CB Reid client. A summary of these timeframes (for guidance) is given in appendix 1 of this guide which is also available from [www.cbreid.co.uk/privacy](http://www.cbreid.co.uk/privacy).

For ex-clients, we will keep information for the periods stated in appendix 1 and no longer.

These statutory timeframes are deemed to override the requirements of GDPR.

**13. What if I exercise my rights under GDPR and request that my information is deleted?**

Provided your information is not covered by the above statutory requirements then we will deal with this request in accordance with your rights under GDPR.

**14. How do I go about exercising any of my other rights under GDPR?**

Your rights as an individual are available at [www.ico.org.uk](http://www.ico.org.uk). If you wish to exercise any of these rights you can do so at any point by contacting Matt Haines (Data Protection Point of Contact) on 01305 215800 or [mhaines@cbreid.co.uk](mailto:mhaines@cbreid.co.uk).

**15. What will CB Reid do in the event of a data breach?**

CB Reid has a robust system in place for fulfilling its obligations to the Information Commissioner's Office (ICO) in the event of a data breach. Our obligations in this regard can be found at [www.ico.org.uk](http://www.ico.org.uk).

If your query or concern is not addressed above, please contact Matt Haines on 01305 215800 or at [mhaines@cbreid.co.uk](mailto:mhaines@cbreid.co.uk) who will be happy to assist you.

## Appendix 1 - CB Reid minimum standard document retention periods

Investment Business Records	Documents will be kept for at least six years from the date they were made. Such information should be kept in a format that is readily available for inspection and easily printed.
Audit files and working papers	Audit Regulations require current year plus a further six years.
Accounts preparation working papers	Current year plus six further years.
General tax papers including correspondence	Current year plus six further years, then return to client.
Original documentation	Retain as long as instruction requires and then return to client.
Information relating to client's chargeable assets and gifts	Indefinitely.
Documents of title (e.g. leases)	12 years after interest in property ceases.
PAYE files	Current year plus six further years.
Insolvency related files	Current year plus six further years.
Office papers – general office correspondence and time records	Current year plus six further years.
Anti money laundering records	Five years from the completion of the transactions or end of the relevant business relationships.