

Data Protection Impact Assessment Report

Blatchford Website



blatchford

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1. How to use this Document

This document is part of a suite of documents to support Information Asset Owners (IAOs) in completion of Data Protection Impact Assessments (DPIAs) for the assets they own. This is the third document in the suite. Accompanying documents (Screening Questions, Information Flows and Risk Assessments) are held in the Blatchford Information Security Management System (ISMS).

2. Description of the Processing

The Blatchford web site consists of 3 services:

2.1. General Website

www.blatchford.co.uk is the general website and it contains information that is available to the general public about Blatchford products and services, Blatchford news items and information about Blatchford as a company. The information it collects about individuals is very limited and used to help the user experience (e.g. session cookies). The information collected does not contain any special categories.

2.2. Contact Request

A form is contained on the Blatchford website for any member of the public to contact Blatchford. This collects a basic set of information including, email address, telephone number (optional), email address and information about what the individual wants from Blatchford. This is sent directly into a general email box for customer services to respond to. The information collected does not contain any special categories.

2.3. Mailing List Registration

A form is also provided (under join our mailing list) that allows the public or organisations to register interest in receiving our email service. The service keeps individuals or organisations up to date on the Blatchford news (without visiting the website), information on new products and services and share stories from people who use the Blatchford products. The personal information captured and processed is minimal although it asks the individual to select what they are interested in and also which country they are in so that the marketing is more relevant to them. The information collected does not contain any special categories.

3. Data Flows

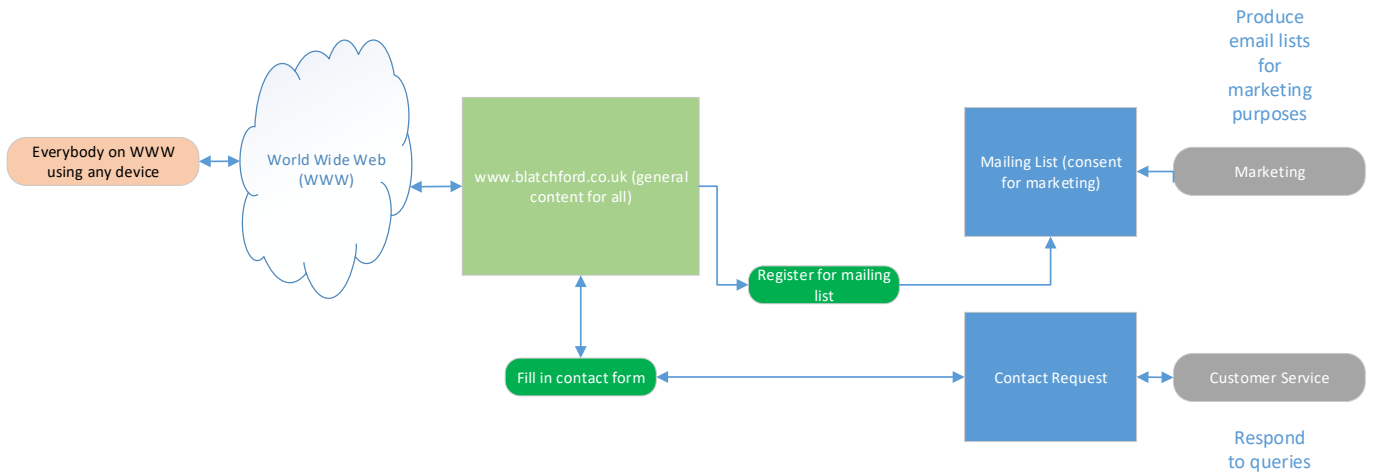
The web site is unrestricted and anyone can access at www.blatchford.co.uk.

Users are able to fill in a contact request which has a minimal dataset of which only name and email address is mandatory as required to reply to a request for information or assistance.

Users are also able to register for the Blatchford emailing list which allows the user to pick any service or product type they are interested in and select the relevant country. It again asks for the

minimum amount of information and also consent that the user is emailed by Blatchford for marketing.

Blatchford Web Site
Primary Data Flows



4. Audience

This Data Protection Impact Assessment Report is available to the public as a publication on the Blatchford web site.

5. Data Protection Impact Assessment Questions

5.1. Name of Stakeholder Groups

There are several stakeholders for this information asset. These are:

- Marketing
- Sales
- Customer Service
- Distributers for Blatchford
- Customers to Blatchford
- Clinical Employees

5.2. Legal Basis for Processing

For all marketing activities, such as the mailing list the individual needs to supply consent in order to receive the marketing material. The individual also needs to reply to an email sent to the email address supplied by them to activate.

For the contact form, Blatchford provide this as a legitimate business interest that does not infringe the interests, rights or freedoms of the individual. The contact form allows users to directly contact Blatchford for any assistance, questions or queries.

5.3. Are individuals clear about the use of their personal data

The individuals are all pointed towards the Blatchford Privacy Policy that is stored on the internet site. The purposes for processing are also on the pages that require any personal information adding.

5.4. Is it necessary to collect and process all data items

Data Categories	Yes	No	Justification
Name	X		Identifies who is asking for information
Address		X	Not collected
DOB		X	Not collected
Gender		X	Not collected
Email Address	X		Contact information for queries and/or marketing
Website Cookies	X		Session cookies in use, enhances navigation and allows logon
Device		X	Not collected
Telephone number	X		Optional, allows another method for contact
Special Categories		X	Not collected

5.5. Will the personal data be shared or merged with other datasets?

The contact information that is provided for our mailing list will be shared with an internal database and also with the third party Mailchimp which Blatchford use for supplying the information to our registered users.

5.6. How long will the personal data be retained

Registered users information will be held for sending out marketing information until they de-register. Once de-registered the individual will be removed from the list by the end of the next working day.

5.7. How will data quality standards be achieved and maintained

All information on the web site has gone through a rigorous quality check and version control prior to the information being made public on the web site.

There is a possibility that an individual may, by mistake, include personal and/or sensitive information in the description area on the contact form. If this occurs that information is not propagated further within Blatchford and the individual will be made aware. Blatchford has reduced the risk of this occurring by only asking for a limited set of personal details.

5.8. Are individuals made aware of their rights

Individuals are made aware of their rights in the Blatchford Privacy Policy which is a link on every page of the Blatchford website. The contact details of the Data Protection Officer are also on the website for any queries around data protection or information security.

5.9. How is an individual's rights upheld?

There is a set of policies and procedures in place to be able to deal internally with the rights if the individual. This includes how to handle subject access requests, logging, timeframes, and legal requirement which is centrally overseen and reported on.

5.10. Have technical and organisational controls been considered

Technical and organisational controls are covered in our Information Security Management System (ISMS). The Blatchford website (www.blatchford.co.uk) has been risk assessed and the controls that are in place have been recorded in the Blatchford Risk Register under the reference BIAS0149.

5.11. Will personal data be transferred outside the EEA

Those individuals that register for the email marketing updates will have their details passed onto to a third party called Mailchimp and also Eventbrite (for events). Mailchimp and Eventbrite process information outside of the EU, in the USA. Both of these suppliers to Blatchford are part of the EU-US Privacy Shield. The details for both can be found on the Blatchford Privacy Policy hosted on the website including their privacy notices.

6. Further Actions

The Data Protection Impact Assessment (DPIA) is to be re-visited on a regular basis during the lifecycle of the Website. This is to ensure:

6.1.Outcomes and measures identified are still relevant and adequate

6.2.Actions to mitigate the risks are implemented

6.3.The mitigation actions are successful

6.4.Upload the latest approved DPIA to the ISMS