GSS Property Consultants Ltd
25 The Netherlands
Coulsdon
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Security Policy

1. This security policy is designed to ensure that GSS Property Consultants Ltd complies with the security requirements of the General Data Protection Regulation, and the rights to privacy of data subjects are protected.

2. In compliance with Article 32 GSS Property Consultants Ltd has implemented appropriate physical, organisational and technical measures to ensure a level of security appropriate to the risk.

3. GSS Property Consultants Ltd is based at 25 The Netherlands, Coulsdon, Surrey CR5 1NJ, home and office, and employs no employees.

Security measures

4. The following security measures have been taken:

Physical

- Office building is alarmed/protected by CCTV cameras and burglar alarm;
- Visitors to premises are supervised at all times;
- Areas of the premises where personal data are kept are secured by locks;
- Computer screens are arranged so they cannot be viewed by casual passers-by, particularly visitors;
- Hard copy material containing personal data is stored securely and locked away in fire proof;
- Hard copy special category data, such as medical records, are kept separately from other, shredded once examined or when case settled.
- Personal data in locked and fire proof cabinets with restricted access;
- Electronic special category data is encrypted with restricted access;
- Electronic data is backed up off site;
- Any server on the premises is kept in a locked room;
- Shredding of confidential information is carried out securely on site or outsourced pursuant to a GDPR compliant contract;
- Computer and other electronic equipment are disposed of in a safe manner by an outsourced and certificated provided.

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5. Managerial

- This policy is regularly reviewed, and Garry Smallwood is committed to ensuring it is implemented;
- Garry Smallwood is responsible for data protection and has powers to discipline for breaches of this and other data protection policies;
- Garry Smallwood has sufficient resources to carry out its role effectively as data protection lead;
- There is in place a procedure for authenticating the identity of telephone callers, clients and contractors.

6. Technical measures

- Anti-virus and anti-spyware tools are installed on all computers;
- All computers are encrypted, and password protected;
- It is a disciplinary offence to share a password;
- Computers are programmed to download patches automatically;
- Computers have automatic locking mechanisms when not in use;
- Computers, laptops, mobile phones, USB sticks and CDs are encrypted, and password protected;
- Personal data is encrypted before it s uploaded onto the cloud;
- Personal data shared by email are encrypted and password protected as appropriate;

7. Security measure are tested and evaluated once a year.

8. Whenever a new project, process or procedure is introduced which carried a high risk to data subjects, a Data Protection Impact Assessment is carried out, at the instigation of Garry Smallwood.