Catherine Doran Proofreading

GDPR compliance and privacy statement 13.8.21

Introduction

How I collect data.

I collect date on clients which means I can fill out HMRC returns e.g., invoicing details and also complete clients' work to their satisfaction. I also collect this data so I can demonstrate that I adhere to good standards of ethical proofreadint..

How do I collect data?

I collect data in three ways

This data is collected on an Academic Agreement form, and through email conversations.

• Data on clients themselves to enable me to fulfil my obligations to the HMRC e.g. through an Academic Agreement form.
• Work files which may include data on the client and also on their own research participants. These may be electronic audio files ('tapes') and Word or PDF files (together, 'work files')
• Email data via my WordPress website when a reader requests to receive my blog posts via email (should this be enacted) and my contact form.

What data do I collect?

I only ask for data from my clients that I need to fulfil my obligations to the UK tax authority (HMRC) which encompasses name, address and email data. This comes into the category of data collected on a lawful basis at the request of the authorities. I have to include a name and address on my invoice and that is the only personal data I request from my clients.

For a new client, I actively ask them to accept my terms and conditions before proceeding, and this document falls under my terms and conditions. Existing clients have agreements with me already or have agreed to versions of my terms and conditions existing when they became a client.

Data containing identifiable details for clients and their own clients / research participants may be included in the work files. Although this comes under the heading of 'sensitive data', I do not actively collect this data and it is used solely for the purpose of completing the client's work.

Data on email addresses from people who wish to read my WordPress blog posts via email is collected by WordPress and I do nothing further with it.

In all cases, this data is collected on an opt-in only basis:

• Clients contact me and I retain their information once a client-provider relationship is established.
• Clients send me their work files and their clients / research subjects have agreed to have the work files processed by me / a third party in general / the client and their associates.
• Readers opt in to read my blog posts via email and I am unable to opt anyone in on their behalf.

Where do I store data?

Some of the information I collect from clients which has been submitted by email is stored in my email system.

My invoices to them and any work files they have sent me are stored in my digital filing system (on my password-secured PC with anti-virus protection behind a firewall and which is encrypted. I back up data on two external storage (not cloud) systems which are stored in a locked filing cabinet.

Data on WordPress email subscribers is kept only within WordPress.com's system and I do not download or otherwise access it. I am advised that WordPress will be issuing GDPR compliance statements themselves and readers will be able to access this via WordPress.com.

How long do I keep data for?

I have to retain the information I keep on clients for five years from the date of my tax return (see the example dates given on HMRC's website).

I typically retain audio files for one month and work files for up to two years unless I have signed an NDA with my client to do otherwise. Tapes and files are deleted after this time and a new back-up is started regularly to make sure this data is also removed from my external data storage devices.

I retain style sheets for clients for the length of the client relationship. If I do not hear from the client, I keep the sheet for a maximum of three years, after which I will delete the style sheet and other files.

Reader email information is retained by WordPress while they are subscribing to my blog posts. I understand that WordPress.com will be issuing a statement on how they use this data in due course.

How does a client remove data (right to get data deleted)?

Regarding invoices, if a client wishes me to delete all emails and invoices from my files, after the period stated above, I will do this upon receipt of an email request from the client.

Regarding work files, if a client wishes me to delete them, I will do this upon receipt of an email request from the client. If a third-party client's client or research participant requests this, they must do so to my client who will pass the request on to me, and I will do this.

Regarding blog post email alerts, there is an unsubscribe link at the bottom of each email received, allowing the reader to unsubscribe at any point.

I understand this to fulfil the requirement that opting out has to be as easy as opting in.

Right of access

Clients have the right to check what data I have stored for them and I will provide information on this within 48 hours of their request. Third parties must request this from their contact rather than from me.

Right to get data corrected

If a client finds I have incorrect data for them, upon their request by email I will amend that data. See note on third parties above.

Right to data portability

I do not hold any complicated data outside of a client's name, address and email address and work files. If a client wishes to obtain this data to move it to another supplier, I will provide all data to them within 48 hours. See note on third parties above.

How do I share data and what do I share?

I do not share any client data with any third parties except when specifically, and overtly, requested to by the client. This would only occur if I was passing overflow work to a colleague. In this situation, I will contact my client with my colleague's name, email address and website (which are all publicly available), with their consent, and may pass non-sensitive data on pricing and invoicing procedures back to my colleague, with my client's consent.

No data is used for marketing or selling purposes.

I do not share any data with any other editors, proofreaders, businesses or third parties (with the exception of HMRC (the UK tax authority) if they request to see all my files for audit as this is a legal requirement).

It is my understanding that the above statements mean that as a sole trader, I will be compliant with the GDPR.

If you have any questions about what I do with data or want confirmation on any further elements before agreeing to work with me, please do not hesitate to ask.

This is based on an EU regulation and I have been compliant with it as long as the UK remained within the EU. It is expected that the UK will implement similar rules upon exit from the EU, and I will

update this statement as and when I need to following the availability of new information. I will expect my clients to check this statement regularly for updates.