**General Data Protection Regulation.**

This document discusses the impact of GDPR with the Hawkstone Design software; Annapurna, Solenzara, Orinoco, Kalahari.

This guidance is based on David Bunney attending a course on GDPR and should not be taken in anyway as definitive and advice should be taken on individual circumstances.

The information commissioner’s office has produced several documents and this is a good introduction.

<https://ico.org.uk/media/for-organisations/documents/1595/pia-code-of-practice.pdf>.

There is a distinction between data processors and data controllers. The definitions are

"Processor - means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller."

"Controller – means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing of personal data…"

Generally labs are data processors and generally labs are not holding data on individuals. Organisations are not generally within the remit of GDPR. Data processors need to hand personal data in

Customer records within Annapurna and Solenzara will contain information on organisations and sometimes individuals. Any personal information held here should only be held that is relevant for order processing and should not be retained when no longer needed.

For the order processing, usually the only personal information that is held in orders is that a patient’s name can be provided by the optician as a reference for processing the order. As data processor this is a legitimate use for such data but even so any handling of this information should be considered as confidential. The safest way would be to discourage the use of any potential identifiers of personal information in the order reference.

When orders are sub contracted to third parties within the EU then the Annapurna job number or tray is used as the order reference for the lab so patient name is not transmitted.

Some labs may produce customer care cards with guarantee information that contains the patient name. The safer way would be to print the product information and allow the optician to manage the patient’s details but if name is provided then it is relevant for the order production.

Annapurna is an order processing system and is not directly used for marketing although information can be extracted for marketing. If such extracts are made then checks need to be made that personal information is not extracted.

If there are data breaches then there are obligations to report these breaches.

In summary, there is very little use of individual’s personal information in the Hawkstone Design software but where it is held then the information should be handled in a confidential manner and retained as necessary.

More information for the optical industry can be found at

<http://www.opticalconfederation.org.uk/downloads/data-protection-and-gdpr-guidance--final.pdf>