

### Data Protection

Data protection compliance should be seen as an integral part of employment practice. It is important to develop a culture in which respect for private life, data protection, security and confidentiality of personal information is seen as the norm.

#### **SCOPE**

The company is fully committed to ensuring compliance with the requirements of the General Data Protection Regulation (“the regulation”), and regards the lawful and correct treatment of personal data as important to its successful operations and maintaining confidence between us and those with whom we interact.

This policy applies to all employees. All our employees should be aware of and work within their responsibilities for the personal data they hold about an individual.

#### **DATA**

Data is information, which is stored electronically, or in paper based filing systems.

Personal Data is any data relating to a living person, who can be identified through this data. This can be a personal email address, home address, date of birth, habits, lifestyle, computer IP addresses, education, and includes any expression of opinions about that person such as that held in probation reviews, PDRs.

**Special Category Data:** This data is sensitive personal data about the individual such as:

- Physical or mental health
- Sexual orientation
- Racial or ethnic origin
- Political opinions
- Religion or beliefs
- Trade union membership

In addition, while criminal record checks are separately categorised under the regulation, they are treated in a similar way due to the sensitivity of this data.

## INDIVIDUAL RIGHTS PROTECTED UNDER THE REGULATION

- The right to be informed
- The right to access
- The right to rectification
- The right to be forgotten
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making

We encourage all those who have any concerns about how personal data is being processed, whether a breach has been made or not, to discuss this matter further. This will ensure any proactive measures such as training or procedural changes can be instigated and can prevent potential future breaches.

Any deliberate and malicious breach of an individual's personal data will lead to disciplinary action being undertaken.

Our data breach policy provides details on how to report a breach as well as the company's response plan.

## SUBJECT ACCESS REQUEST

Under the regulation, an individual can request access to personal information about themselves, which is controlled by the company.

## REPORTING BREACHES

Any breaches of the regulation, whether deliberate or not, should be reported to the human resources manager or the business systems director without delay on the contact details above. This will enable all necessary measures to be put in place to minimise and mitigate any breaches. Information should include as much factual information as possible as to the breach that has taken place.

This policy does not form part of the contract of employment and may be amended by the company from time to time.



**Position:** Director

**Last Review:** July 2021

**Next Review Due:** January 2022