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Role/Site/Client **Company-Wide**

Task/Name of SOP	Data Protection Policy
References:	Data Protection Act Company DP Procedures Disciplinary Procedures Employee Handbook GDPR

Brief:

There are occasions when the Company needs to collect and use personal data about people including past, present and prospective employees and subcontractors or general public in order to continue with its business and effectively meet its customers' requirements.

The proper and lawful processing of personal data is very important to maintaining our customers' faith and confidence in our operation and ability to meet their expectations. This policy sets out the general procedures that the company will follow.

Policy Details:

There are occasions when the Company needs to collect and use personal data about people including past, present and prospective employees and subcontractors or general public in order to continue with its business and effectively meet its customers' requirements.

The proper and lawful processing of personal data is very important to maintaining our customers' faith and confidence in our operation and ability to meet their expectations.

Everyone at the Company has an important role to play in ensuring that personal information is processed lawfully and fairly. Personal information is information relating to a living individual who can be identified. We hold personal information about all sorts of people we deal with, including employees and subcontractors.

All personal information must be dealt with correctly no matter how it is collected, recorded and used, whether on paper, in a computer, or on other material.

This must be in accordance with the provisions of the Data Protection Act 1998 and the General Data Protection Regulations.

Every employee has a duty to be aware of the Act's principles in order to ensure that the Company effectively complies with the law on data protection.

Any personal data which we collect, record or use in any way whether it is held on paper, on computer or other media will have appropriate safeguards applied to it to ensure that we comply with the Data Protection Act 1998. We fully endorse and adhere to the eight principles of Data Protection as set out in the Data Protection Act 1998 and the General Data Protection Regulations from May 2018.

The eight principles are as follows:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the Act.
7. Appropriate technical and organizational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal Data shall not be transferred to a country or territory outside the European unless country or territory ensures an adequate level of protection for the rights and freedom of data subjects in relation to processing of personal data.

To ensure that the requirements of the principles are adhered to, the Company will:

1. **Appoint managers with specific responsibility for data protection in the organisation.**
2. **All employees managing and handling personal information are trained appropriately.**
3. **Everyone in the Company managing and handling personal information is supervised appropriately.**
4. **Anyone in the Company who does not normally handle personal information knows what to do if the occasion arises.**
5. **Subject access requests and queries about personal information are dealt with promptly and courteously.**
6. **Policy and guidelines on handling personal information are published, and are clear and up to date.**
7. **Periodic reviews are undertaken of the way personal information is managed and handled by the Company.**
8. **Measures to monitor the Company's compliance with the Data Protection Act 1998 are put in place.**

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9. **Incidents involving breaches of this policy are recorded and analysed, and disciplinary action taken as appropriate.**
 10. **This policy integrates with other corporate policies associated with data protection.**
 11. **This policy is reviewed regularly and updated when necessary.**

Where we collect any sensitive data, we will take appropriate steps to ensure that we have explicit consent to hold, use and retain the information. Sensitive data is personal data about an individual's racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sex life, details of the commission or alleged commission of any offence and any court proceedings relating to the commission of an offence.

The Company follows an ethical marketing practice and does not give details of customers, suppliers or subcontractors without their explicit consent.

Under the Data Protection Act, any individual may write to the Data Protection Co-ordinator at the above address and request a copy of the information which we hold about them. In line with the General Data Protection Regulations, there will be no fee for this and we will respond within one month of receiving the request.

The company will respect all provisions of the GDPR including the right to erasure, amend information and for decisions to be made by humans.

Eboracum UK Ltd is registered with the Information commissioners office.

It is company policy for ALL employees to undertake Data Protection e-learning on an annual basis.

Approved By:

Carl Nickson
Director
15-1-2022

