

GDPR POLICY STATEMENT

THE GROUP OF COMPANIES IS FULLY COMMITTED TO FULL COMPLIANCE WITH THE REQUIREMENTS OF THE GENERAL DATA PROTECTION REGULATION. THE GROUP OF COMPANIES WILL THEREFORE FOLLOW PROCEDURES WHICH AIM TO ENSURE THAT ALL EMPLOYEES, CONTRACTORS, CONSULTANTS, PARTNERS OR CUSTOMERS OF THE GROUP OF COMPANIES (COLLECTIVELY KNOWN AS DATA USERS) WHO HAVE ACCESS TO ANY PERSONAL DATA HELD BY OR ON BEHALF OF THE GROUP OF COMPANIES ARE FULLY AWARE OF AND ABIDE BY THEIR DUTIES UNDER THE GENERAL DATA PROTECTION REGULATION

THE GROUP OF COMPANIES NEEDS TO COLLECT AND USES INFORMATION ABOUT PEOPLE WITH WHOM IT WORKS IN ORDER TO OPERATE AND CARRY OUT ITS FUNCTIONS. THESE MAY INCLUDE CURRENT, PAST AND PROSPECTIVE EMPLOYEES, CLIENTS AND CUSTOMERS, SUPPLIERS AND SUB-CONTRACTORS. IN ADDITION THE GROUP OF COMPANIES MAY BE REQUIRED BY LAW TO COLLECT AND USE INFORMATION IN ORDER TO COMPLY WITH THE REQUIREMENTS OF CENTRAL GOVERNMENT. THIS PERSONAL INFORMATION MUST BE HANDLED AND DEALT WITH PROPERLY HOWEVER IT IS COLLECTED, RECORDED AND USED AND WHETHER IT IS ON PAPER, IN COMPUTER RECORDS OR RECORDED BY OTHER MEANS.

THE GROUP OF COMPANIES REGARDS THE LAWFUL AND APPROPRIATE TREATMENT OF PERSONAL INFORMATION AS VERY IMPORTANT TO ITS SUCCESSFUL OPERATIONS AND ESSENTIAL TO MAINTAINING CONFIDENCE BETWEEN THE GROUP OF COMPANIES AND THOSE WITH WHOM IT CARRIES OUT BUSINESS. THE GROUP OF COMPANIES IS REGISTERED WITH THE ICO AND THEREFORE FULLY ENDORSES AND ADHERES TO THE PRINCIPLES OF THE GENERAL DATA PROTECTION REGULATION.

THE GROUP OF COMPANIES WILL, THROUGH MANAGEMENT AND USE OF APPROPRIATE CONTROLS, MONITORING AND REVIEW:

- USE PERSONAL DATA IN THE MOST EFFICIENT AND EFFECTIVE WAY TO DELIVER BETTER SERVICES
- STRIVE TO COLLECT AND PROCESS ONLY THE DATA OR INFORMATION WHICH IS NEEDED
- USE PERSONAL DATA FOR SUCH PURPOSES AS ARE DESCRIBED AT THE POINT OF COLLECTION, OR FOR PURPOSES WHICH ARE LEGALLY PERMITTED
- STRIVE TO ENSURE INFORMATION IS ACCURATE
- NOT KEEP INFORMATION FOR LONGER THAN IS NECESSARY
- SECURELY DESTROY DATA WHICH IS NO LONGER NEEDED
- TAKE APPROPRIATE TECHNICAL AND ORGANISATIONAL SECURITY MEASURES TO SAFEGUARD INFORMATION (INCLUDING UNAUTHORISED OR UNLAWFUL PROCESSING AND ACCIDENTAL LOSS OR DAMAGE OF DATA)
- ENSURE THAT INFORMATION IS NOT TRANSFERRED ABROAD WITHOUT SUITABLE SAFEGUARDS
- ENSURE THAT THERE IS GENERAL INFORMATION MADE AVAILABLE TO THE PUBLIC OF THEIR RIGHTS TO ACCESS INFORMATION
- ENSURE THAT THE RIGHTS OF PEOPLE ABOUT WHOM INFORMATION IS HELD CAN BE FULLY EXERCISED UNDER THE GENERAL DATA PROTECTION REGULATION

THESE RIGHTS INCLUDE:

- THE RIGHT TO BE INFORMED
- THE RIGHT OF ACCESS TO PERSONAL INFORMATION
- THE RIGHT TO REQUEST RECTIFICATION
- THE RIGHT TO REQUEST ERASURE
- THE RIGHT TO RESTRICT PROCESSING IN CERTAIN CIRCUMSTANCES
- THE RIGHT TO DATA PORTABILITY
- THE RIGHT TO OBJECT TO PROCESSING

- THE PRINCIPLES OF DATA PROTECTION
- ANYONE PROCESSING PERSONAL DATA MUST COMPLY WITH 6 PRINCIPLES OF GOOD PRACTICE. THESE PRINCIPLES ARE LEGALLY ENFORCEABLE.

SUMMARISED, THE PRINCIPLES REQUIRE THAT PERSONAL DATA SHALL BE:

- 1. PROCESSED LAWFULLY, FAIRLY AND IN A TRANSPARENT MANNER IN RELATION TO INDIVIDUALS
- 2. COLLECTED FOR SPECIFIED, EXPLICIT AND LEGITIMATE PURPOSES AND NOT FURTHER PROCESSED IN AN MANNER THAT IS INCOMPATIBLE WITH THOSE PURPOSES; FURTHER PROCESSING FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES SHALL NOT BE CONSIDERED TO BE INCOMPATIBLE WITH THE INITIAL PURPOSES;
- 3. ADEQUATE, RELEVANT AND LIMITED TO WHAT IS NECESSARY IN RELATION TO THE PURPOSES FOR WHICH THEY ARE PROCESSED;
- 4. ACCURATE AND WHERE NECESSARY, KEPT UP TO DATE; EVERY REASONABLE STEP MUST BE TAKEN TO ENSURE THAT PERSONAL DATA THAT ARE INACCURATE, HAVING REGARD TO THE PURPOSES FOR WHICH THEY ARE PROCESSED, ARE ERASED OR RECTIFIED WITHOUT DELAY;
- 5. KEPT IN A FORM WHICH PERMITS IDENTIFICATION OF DATA SUBJECTS FOR NO LONGER THAN IS NECESSARY FOR THE PURPOSES FOR WHICH THE PERSONAL DATA ARE PROCESSED; PERSONAL DATA MAY BE STORED FOR LONGER PERIODS INSOFAR AS THE PERSONAL DATA WILL BE PROCESSED SOLELY FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES SUBJECT TO IMPLEMENTATION OF THE APPROPRIATE TECHNICAL AND ORGANISATIONAL MEASURES REQUIRED BY THE GDPR IN ORDER TO SAFEGUARD THE RIGHTS AND FREEDOMS OF INDIVIDUALS;
- 6. PROCESSED IN A MANNER THAT ENSURES APPROPRIATE SECURITY OF THE PERSONAL DATA, INCLUDING PROTECTION AGAINST UNAUTHORISED OR UNLAWFUL PROCESSING AND AGAINST ACCIDENTAL LOSS, DESTRUCTION OR DAMAGE, USING APPROPRIATE TECHNICAL OR ORGANISATIONAL MEASURES IN ACCORDANCE WITH THE RIGHTS OF DATA SUBJECTS UNDER THE ACT

THE ACT PROVIDES CONDITIONS FOR THE PROCESSING OF ANY PERSONAL DATA. IT ALSO MAKES A DISTINCTION BETWEEN PERSONAL DATA AND 'SPECIAL CATEGORY' DATA.

PERSONAL DATA IS DEFINED AS ANY INFORMATION RELATING TO AN IDENTIFIED OR IDENTIFIABLE NATURAL PERSON

SPECIAL CATEGORY DATA IS DEFINED AS PERSONAL DATA CONSISTING OF INFORMATION AS TO:

- RACIAL OR ETHNIC ORIGIN • POLITICAL OPINION
- RELIGIOUS/PHILOSOPHICAL BELIEFS
- TRADE UNION MEMBERSHIP
- PHYSICAL OR MENTAL HEALTH OR CONDITION • SEXUAL LIFE OR SEXUAL ORIENTATION
- BIOMETRIC DATA

THIS POLICY WILL BE REVIEWED ANNUALLY AT MANAGEMENT REVIEW TAKING INTO ACCOUNT CHANGES IN LEGISLATION AND FOR ADEQUACY, EFFECTIVENESS & SUITABILITY