	POL 21 Issue 2 Date 14/05/18 Review Date 23/02/19
Company Policy	Reviewer: Director of Operations

SpliceGroup GDPR - General Data Protection Regulation

Why this policy exists

The GDPR data protection policy ensures SpliceGroup :

- **Complies with data protection law and follows good practice**
- **Protects the rights of staff, customers and partners**
- **Is open about how it stores and processes individuals' data**
- **Protects itself from the risks of a data breach**

The appointed **DPO** Data Protection Officer is the **SpliceGroup Finance Director**

The **DPO** is responsible for:

- Keeping the board updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and related policies
- Arranging data protection training and advice for the people covered by this policy
- Handling data protection questions from staff and anyone else covered by this policy
- Dealing with requests from individuals to see the data Splicegroup holds about them
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data

SpliceGroup IT services are outsourced to Serif.net.
IT and IT security is managed jointly by the Finance Director and the Director of Operations who are responsible for:

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards
- Performing regular checks and scans to ensure security hardware and software is functioning properly
- Evaluating any third party services the company is considering using to store or process data. For instance, cloud computing services.

All employees upon joining the company are enrolled into the online training portal and issued mandatory training modules, some of which have to be completed annually.
GDPR is one of the mandatory training modules and employees are expected to complete this within their first month of employment.

The GDPR policy will be issued annually or when any changes are made.

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Anyone who obtains personal information ("data") about other individuals is a 'data controller' and is thus regulated by the Data Protection Act 1998. The Act controls what can lawfully be done with information.

It also gives individuals certain rights to control how information about them is obtained, used, stored and distributed. These rights include the right to find out what information a data controller has about them, and ask for copies of data.

We are a data controller in relation to all the information that we obtain about you as part of the process of providing you with employment.

In order to manage our business we keep records about our employees that includes the following information:

- Name
- Date of birth
- Sex
- Postal Address
- Email address
- Passport
- Driving licence
- Vehicle insurance
- Telephone numbers
- Next of kin
- Sickness record
- Medical Record
- Disciplinary record
- C.V.
- References
- Qualifications / Training Records
- Rate of pay
- Payroll Related information; Bank details, NI number, Tax etc
- Pension
- Private Health care
- Performance record
- Appraisals
- Criminal records
- Credit Checks

Some employees as part of their role and in line with customer requirements may be required to undergo Credit, DBS or SC checks. This will only be undertaken by prior authorisation for those concerned.

Any Drug or Alcohol testing will be done by prior authorisation.

Any medical information will be retained as per the policy.

Information will be retained for 7 years after leaving SpliceGroup.

Please see SpliceGroup Privacy notice for further details.

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It is a requirement under the Data Protection Act that you consent to our processing data about you. Some data is referred to in the Act as "sensitive personal data". This means personal data consisting of information as to:

- the racial or ethnic origin of the data subject;
- his/her political opinions;
- his/her religious beliefs or other beliefs of a similar nature;
- whether he is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992);
- his/her physical or mental health or condition;
- his/her sexual life;
- the commission or alleged commission by him/her of any offence, or
- any proceedings for any offence committed or alleged to have been committed by him/her, the disposal of such proceedings or the sentence of any court in such proceedings.

We require that you expressly consent in your contract of employment to our processing data including sensitive personal data about you. Without this consent it is not necessarily lawful for us to process data in order to keep the records about your employment necessary for us to meet the needs of running our business.

Below is a summary of the legal obligations imposed upon us and the rights that you have under the Data Protection Act 1998 together with our policies about those rights and obligations. The Act contains transition periods under which its terms become fully effective over a period of years, however our policy assumes that the Act is fully in force.

Our Obligations

The principles for processing of personal data are underpinned by eight important principles:

1. Fairly and lawfully processed.
2. Processed for specific, lawful purposes.
3. Be adequate, relevant and not excessive.
4. Accurate and up to date
5. Not kept longer than necessary.
6. Processed in accordance with the data subject's rights.
7. Secure and protected appropriately
8. Not transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

We are committed to following these principles and that is why your consent has been obtained so that all our data processing in relation to data of which you are the subject is lawful.

We will process data about you only as far as is necessary for the purpose of managing our business. Data will not be disclosed to anyone else other than our authorised employees, customers who require Photo ID cards/passes for you to work on their premises, agents, contractors or advisors (except as

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required by law) unless you expressly authorise its disclosure. We will only obtain data about you that we require for the purpose of managing our business and dealing with you as an employee of that business.

We will take all reasonable steps to ensure that the data we process is accurate. Data will be retained as necessary during the course of your employment and records will be retained for up to seven years after the data that you leave the employment in case legal proceedings arise during that period. Data will only be retained for a period of longer than seven years if it is material to legal proceedings or should otherwise be retained in our interests after that period.

We will process data in accordance with your rights under the Act.

Data will be kept in a secure system whether manual or computerised to the best of our ability at all times.

If you think there is a problem in the way we are handling your data you can report a concern via the Information Commissioner's Office (ICO)

https://ico.org.uk

END OF DOCUMENT

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