

Data Protection Policy



Version no.	01
Page no.	1 of 5
Effective date	15/11/2022
Updated as per	14/09/2022

Target audience

<ul style="list-style-type: none">All staff

Responsible persons

H&S contact	Stephen Carulli		
Standard owner	Stephen Carulli		
Approved by	Executive Management Team	Date	14/09/2022

Related documents

Policies	N/A
Guidance documents	<ul style="list-style-type: none">General Arrangements for GDPRManagement System

Group standard compliance

<p><i>Primary responsibility for adherence to this Group Standard resides with the CEO for Group and Managing Directors for their respective units. Decisions and actions in breach of this policy can only be carried out with prior, written approval from the Executive Management Team (a 'waiver').</i></p>
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Policy update description

Revision	Date	Author	Description
A	15/11/2022	Stephen Carulli	Initial Issue
B	14/09/2022	Stephen Carulli	Revised to new format

	Policy content
1.	<p>1. Purpose</p> <p>The purpose of this policy is to outline the Company's policy regarding the processing, protecting and maintaining of personal and confidential data. This policy is in accordance with the Data Protection Act 2018 and the General Data</p>

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	<p>Protection Regulation (EU) 2016/679 (GDPR), the purpose of which is to protect the rights and privacy of individuals, and to ensure that data about them are not processed without their knowledge.</p>
2.	<p>2. Scope</p> <p>2.1. This policy applies to electronic and paper records containing personal data. It also covers data held on all employees of the Company. All customers, consultants, suppliers and subcontractors, along with anyone who may process personal data on behalf of the Company, are required to strictly adhere to this policy.</p>
3.	<p>3. Policy Statement</p> <ul style="list-style-type: none">• The company holds and processes important information about employees, customers, consultants, suppliers and subcontractors. This information includes, but is not solely limited to, contact details, bank accounts and payment details. The Company recognises the importance of handling such sensitive information and how the management of this data affects the individuals concerned. Through this Data Protection policy, the Company endeavours to ensure that the information held on its systems is kept secure and accurate. <p>The Company and all staff are committed to fully complying with the principles set out in the General Data Protection Regulations:</p> <ol style="list-style-type: none">1. Lawfulness, fairness and transparency Transparency: We will inform the subject what data processing will be done. Fair: What is processed will match up with how it has been described. Lawful: Processing will meet the tests described in GDPR [article 5, clause 1(a)].2. Purpose limitations Data will only be used for specific processing purposes that the subject has been made aware of and no other, without further consent.

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	<p>3. Data minimisation Data collected on a subject will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. In other words, no more than the minimum amount of data will be kept for specific processing.</p> <p>4. Accuracy Data will be accurate and where necessary kept up to date.</p> <p>5. Storage limitations Data will be stored for no longer than is necessary, after which time it will be removed from our systems.</p> <p>6. Integrity and confidentiality We will handle data in a manner ensuring appropriate security of the personal data including protection against unlawful processing or accidental loss, destruction or damage</p>
4.	<p>4. Security The Company must ensure that they follow the laid down security procedures for handling data to ensure there is no unauthorised disclosure.</p>
5	<p>5. The CEO has overall responsibility for this policy.</p> <p>Company Responsibilities: The Company has a responsibility to ensure that personal data dealt with in the course of the Company's business is handled in accordance with the GDPR provisions and reasonable steps will be taken by all concerned to ensure this duty is observed.</p> <p>The Company will take such measures as may be necessary to ensure the proper training, supervision and instruction of all relevant employees in matters pertaining to data protection and to provide any necessary information.</p>

	<p>The Company shall not be held responsible for errors of which it has not been informed.</p>
6.	<p>6. Rights of Access</p> <p>Data subjects will have the right to:</p> <ul style="list-style-type: none">• access and obtain a copy of their data on request;• require the organisation to change incorrect or incomplete data;• require the organisation to delete or stop processing their data, for example where the data is no longer necessary for the purposes of processing; and• object to the processing of their data where the organisation is relying on its legitimate interests as the legal ground for processing. <p>If a data subject would like to access any of these rights they should write to the Company's Data Protection Officer, at SCSAFETY-TRAINING@HOTMAIL.COM</p> <p>If a data subject believes that the Company has not complied with their data protection rights, they have the right to complain to the Information Commissioner.</p>
7.	<p>7. Individual Subject Access</p> <p>Upon receiving a subject access request, the Company will first ensure that the individual requesting information has a legal right to see this information and will validate the individual's identity.</p> <p>The Company will gather any manual or electronically held information (including emails) and will identify any information provided by a third party or which identifies a third party. If information is identified which relates to third parties, the Company will write to them asking whether there is any reason why this should not be disclosed. The</p>

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	<p>Company will not supply information unless the other party has agreed for us to do so or it is reasonable to do so without their consent.</p> <p>The Company will have one month (from when we have received all the information necessary to identify the individual and to identify the information</p>
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Stephen Carull CEO – SC Safety Training Ltd	14/09/2022
	