

KGB Cleaning South West Ltd General Data Protection Regulations 2018 Policy



This policy applies to:

- KGB Cleaning South West Ltd.
- All employees, including site based, operational, office based employees and consultants operating on behalf of KGB Cleaning South West Ltd.

This policy is effective from the 25th May 2018 and will be reviewed on an annual basis.

The purpose of this policy is to enable KGB Cleaning South West Ltd to:

- Comply with our legal, regulatory and corporate governance obligations and good practice.
- Gather information as part of investigations by regulatory bodies or in connection with legal proceedings or requests.
- Ensure business policies are adhered to, including such as policies covering email and internet use.
- Fulfill operational reasons, such as recording transactions, training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking.
- Investigate complaints.
- Check references and ensuring safe working practices.
- Monitor and manage employees access to systems, facilities, employee absences, administration and assessments.
- Monitor employees conduct and disciplinary matters.
- Marketing of our business.
- Improve service provision.

This policy applies to information relating to identifiable individuals e.g. employees, applicants, former employees, clients, suppliers and other third-party contacts.

KGB Cleaning South West Ltd will:

- Comply with both the law, legislation and good practice.
- Respect individuals' rights.
- Be open and honest with individuals whose data is held.
- Provide training and support for employees who handle personal data, so that they can act confidently and consistently.

KGB Cleaning South West Ltd recognises that its first priority under the General Data Protection Regulations 2018 is to avoid causing harm to individuals. In the main this means:

- Complying with your rights as an employee.
- Keeping you informed about the data we hold, why we hold it and what we are doing with it.
- Keeping information secure and restricting access only to those who are deemed an authorised person.
- Holding good quality information.

The General Data Protection Regulations 2018 aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, KGB Cleaning South West Ltd will

KGB Cleaning South West Ltd

General Data Protection Regulations 2018

Policy



seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used. This includes the right to erasure where data is no longer necessary and the right to rectification where the data is incorrect. Full details are available in the Privacy Policy.

KGB Cleaning South West Ltd has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality e.g. information being given out inappropriately.
- Insufficient clarity about the range of uses to which data will be processed, leading to Data Subjects being insufficiently informed
- Failure to offer choice about data use when appropriate
- Breach of security by allowing unauthorised access.
- Failure to establish efficient systems of managing changes, leading to personal data being not up to date or expired.
- Harm to individuals if personal data is not up to date or expired.
- Insufficient clarity about the way personal data is being used e.g. given out to unauthorised persons.
- Failure to offer choices about use of contact details for employees, clients personnel or consultants working on behalf of the Company.

In order to address these concerns and to accompany this policy, we have an accompanying Information Security Policy and we will issue a Privacy Policy to explain what data we have, why we have it and what we will do with it. The Privacy Policy will also explain the data subject's rights. We will offer training to staff where this is necessary and appropriate in the circumstances to ensure compliance with General Data Protection Regulations 2018. Such training will vary according to the role, responsibilities and seniority of those being trained.

We aim to keep data only for so long as is necessary which will vary according to the circumstances.

We have no intention to transfer data internationally.

The person responsible for Data Protection is currently the Compliance Manager with the following responsibilities:

- Briefing the board on Data Protection responsibilities.
- Reviewing Data Protection and related policies.
- Advising other employees on Data Protection issues.
- Ensuring that Data Protection induction and training takes place.
- Notification and training of the General Data Protection Regulations 2018.
- Handling subject access requests.
- Approving unusual or controversial disclosures of personal data.
- Approving contracts with Data Processors.
- Ensuring Data is stored securely.
- Maintain a Data Audit and keep this up to date.
- Reporting breaches to the Information Commissioners Office (ICO) and the relevant Data Subject(s).

KGB Cleaning South West Ltd

General Data Protection Regulations 2018

Policy



Significant breaches of this policy will be handled under KGB Cleaning South West Ltd disciplinary procedures, which may be deemed as Gross Misconduct.

Subject Access Request

Any subject access requests will be handled by the Compliance Manager.

Subject access requests can either be verbal or in writing, any subject access requests received must be confirmed in writing to the requester by the Compliance Manager to ensure that accurate records can be kept. All employees are required to pass on anything, which might be a subject access request to the Compliance Manager without delay. The applicant will be given their data within 1 month unless there are complexities in the case which justify extending this to 2 months. You will be notified of any extensions to the deadline for response and the reasons as soon as possible.

We have the right to refuse a subject access request where data is requested at unreasonable intervals, manifestly unfounded or excessive. You will be notified of the reasons as soon as possible.

Where the individual making a subject access, request is not personally known to the Compliance Manager their identity will be verified before handing over any information.

The required information will be provided in a permanent and portable form unless the applicant makes a specific request to be given supervised access in person.

You have the right to request the information we hold to be rectified if it is inaccurate or incomplete. You should contact the Compliance Manager and provide them with the details of any inaccurate or incomplete data. The Company will then ensure that this is amended within one month. We may, in complex cases, extend this period to two months.

You have the right to erasure in the form of deletion or removal of personal data where there is no compelling reason for its continued processing. We have the right to refuse to erase data, where this is necessary in the right of freedom of expression and information, to comply with a legal obligation for the performance of a public interest task, exercise of an official authority, for public health purposes in the public interest, for archiving purposes in the public interest, scientific research, historical research, statistical purposes or the exercise or defence of legal claims. You will be advised of the grounds of our refusal should any such request be refused.

John Nicholls, Managing Director

25th May 2018