

# DATA PROTECTION POLICY

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01/11/17  
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## 1. SCOPE

This policy describes how personal data is collected, handled and stored to meet EasTec UK Ltd data protection standards and to comply with the law.

The Data Protection Act 1998 applies to every business that collects, stores and uses personal data relating to customers, staff or other individuals.

### 1.1 The policy applies to:

- Head office of EasTec UK Ltd
- All branches of EasTec UK Ltd
- All staff and volunteers of EasTec UK Ltd
- All contractors, suppliers, instructors and other people working on behalf of EasTec UK Ltd

### 1.2 It applies to all data that the company collects and holds relating to:

- Names of individuals and or customers
- Postal addresses
- Email addresses
- Telephone numbers
- Plus, any other information relating to individuals and or customers.

## 2. RESPONSIBILITIES

EasTec UK Ltd needs to gather and use certain information from customers, suppliers, businesses, employers, instructors and other people the company has a relationship with or may need to contact. Everyone who works for or with EasTec UK Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

### 2.1 EasTec UK Ltd data protection manager is responsible for:

- Awareness of data protection responsibilities, risks and issues
- Reviewing all data protection procedures and related policies, in line with schedule
- Arrange data protection training and advice for employees
- Handling data protection questions and dealing with customer requests
- Checking for sensitive data in any contracts or agreements with third parties
- Ensuring all systems, services and equipment meet acceptable security standards
- Perform regular hardware and software checks and scans

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- Evaluating any third party services for the purpose of storing or processing data
- Approve any data protection statements attached to e-mails, letters, communication
- Ensure marketing initiatives comply with the data protection principles.

### 3. DATA PROTECTION AND THE LAW

The data protection Act 1998 describes how organisations including EasTec UK Ltd must collect, handle and store personal data. These rules apply regardless of whether data is stored electronically, on paper or on other materials.

EasTec UK Ltd is registered with the Information Commissioner's Office (ICO) to process personal data. As a registered body, EasTec UK Ltd determines the purposes for which, and the manner in which, personal data is to be processed.

The Scottish Information Commissioner and the UK Information Commissioner's Office (ICO) have separate roles and responsibilities. The Scottish Information Commissioner is responsible for the freedom of information compliance of all public authorities in Scotland, while the ICO is responsible for public authorities in England, Wales, and Northern Ireland, and for any agencies operating in both Scotland and another part of the UK. The ICO also covers Data Protection rights (personal information) for the whole of the UK, including Scotland.

The data protection Act 1998 is underpinned by eight important principles. EasTec UK Ltd regards the lawful and correct treatment of personal information as very important and therefore ensures that personal information complies with the principles of the Act.

#### 3.1 The principles say that personal data must:

- (1) Be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met
- (2) 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) Be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
- (4) Be accurate and, where necessary, kept up to date
- (5) Not be kept for longer than is necessary for that purpose or those purposes
- (6) Be processed in accordance with the rights of data subjects under the Act
- (7) Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data

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- (8) Be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

## 4. GENERAL GUIDELINES

**4.1 EasTec UK Ltd** will, through appropriate management, strict applications of controls ensure:

- Confidential information is not shared informally
- Personal data is not disclosed to unauthorised people
- Collect and process appropriate information, only to the extent that is needed
- Employees keep all data secure and is only available to those who need it
- Strong passwords are used and regularly changed
- Appropriate security measures are in place to safeguard personal data
- Data is regularly reviewed, updated and archived in line with guidance and schedules
- When working with personal data, employees ensure screens of their computers are always locked when left unattended
- Hold good quality of information ensuring accuracy of data
- ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data
- Training and assessment materials are kept on secure internal systems that are password protected. Printed assessment materials are locked in secure areas and only available to those intended
- Data is not transferred outside of the European area without suitable safeguards
- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice
- Everyone managing and handling personal information is appropriately trained
- Everyone managing and handling personal information is appropriately supervised
- Anybody wanting to make enquiries about personal information knows the process
- Enquiries are promptly and courteously dealt with
- Ensure that the rights of people about whom information is held can be fully exercised under the Act
- Methods of handling personal information are clearly described
- Methods of handling personal information are regularly reviewed, assessed and evaluated

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- Data protection risks are monitored through EasTec UK Ltd risk register
- Any breach of the rules and procedures identified in this policy is a potential breach of the Code of Conduct and may lead to disciplinary action.

## 5. DATA STORAGE

### 5.1 EasTec UK Ltd will ensure:

- Paper, CD, DVD files are kept in a locked drawer, when not required
- Printouts are not left where unauthorised people could see them
- Data printouts are shredded and disposed of securely when no longer required
- Electronic data is protected from unauthorised access and accidental deletion
- Passwords are changed regularly
- Data is backed up regularly
- Servers and computers are protected by approved security software
- Data is held in as few places as necessary
- Makes every effort to ensure that data held is accurate and kept up-to-date
- Regularly review data that is collected and cleansing of databases
- Regular archiving of data.

## 6. DATA SHARING

All documents created by EasTec UK Ltd are checked for accessibility and compatibility prior to public sharing; documents are also inspected for sensitive and personal data within:

- Comments, revisions, version, annotations
- Document properties and personal information
- Customised ML data
- Invisible content
- Hidden text.

## 7. PRIVACY STATEMENT

EasTec UK Ltd is committed to protecting the privacy and confidentiality of information provided by 'users' who access our website.

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In order for 'users' to use some of our online services and to respond to enquiries we need to collect and process various personal data. Users may be asked to complete an online form(s) which request, name, address, e-mail and telephone number. The personal data we collect is used to process your request for our services.

By submitting personal information, individuals consent to EasTec UK Ltd processing personal information in accordance with our data protection policy. All information provided will be treated as confidential and will only be used for the purpose intended. Anyone can contact EasTec UK Ltd to correct or update personal information in our records.

We may use cookies on our website. Users may disable the use of cookies, but this may limit the functionality of the website. The site and our computer systems have security measures in place with the aim of protecting the loss, misuse or alteration of the information 'users' provide to us.

## 8. REQUEST FOR DATA

An individual is entitled to be given a description of the data being processed or held about them and to be provided with the information constituting personal data and the source.

### 8.1 EasTec UK Ltd will supply information where:

- A request in writing has been made
- A fee not exceeding £10 is received (no VAT applied)
- We are satisfied as to the identity of the applicant
- We are able to locate the requisite data.

Where these criteria have been met EasTec UK Ltd will comply within **40 calendar days**. Where complying with the request would lead to disclosing data about another identifiable person we are not able to comply unless the other individual has consented or it is reasonable to comply without consent.

Where EasTec UK Ltd has previously complied with a request, subsequent or similar requests for data will not be supplied unless a 'reasonable interval' has elapsed. As a non-public body, EasTec UK Ltd is not covered by the Freedom of Information Act.

## 9. ARCHIVING AND RETENTION

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EasTec UK Ltd has an obligation, in line with the data protection policy, to implement and preserve good archiving procedures and processes. Archival records can be in any format; they can exist electronically or paper versions.

## 9.1 Files are summarised as:

- Operational files - that are in use daily
- Reference files - that are not in use daily, but are used for reference
- Inactive files - that are no longer active
- Remove files - that are removed after a period of inactiveness
- Preserved files – that are preserved permanently or for a specified length of time.

## 9.2 EasTec UK Ltd aims to ensure:

- All records that are kept as archives will be included in a records retention log
- All records that are kept as archives will have a review date
- The length of their retention will be appropriate to the record – normally 7 years
- Adhere as far as possible to BSI recommendations for the keeping of its archival records
- Individual staff members are responsible for the management of archival records in their areas of work.

## 9.3 Email archive and retention

- Messages will move to the online archive 18 months from the original send/receive date
- Messages will be deleted from the online archive 5 years from the original send/receive date
- Exceptions: Items in 'Deleted Items', 'RSS Feeds', and 'Sync Issues' folders will be deleted after 90 days.
- Electronic archive folders will be backed up regularly to ensure that they do not get lost.