

GDPR AND DATA PROTECTION POLICY

Clients, Contracts & Business Relationships (CCBR) May 2018

1. Purpose and Scope

This policy describes how Glencross Cleaning Limited collects, handles and stores personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. Glencross Cleaning Limited complies with all statutory requirements of GDPR by registering all personal data held on their computer and/or related electronic equipment and by taking all reasonable steps to ensure the accuracy and confidentiality of such information.

2. Principles

GDPR protects individuals' rights concerning information about them held on by the Company. Anyone processing personal data must comply with the eight principles of good practice. Data must be:

- fairly and lawfully processed
- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- not kept longer than necessary
- processed in accordance with the data subject's rights
- secure
- not transferred to countries without adequate protection

CCBRs can request access to the information held on them by the Company. All requests should be made in writing.

3. The Procedure

CCBRs may be required to give certain information relating to themselves in order that Glencross Cleaning Limited may properly carry out its' duties, rights and obligations. Glencross Cleaning Limited will process and control such data principally for administrative and contract management purposes.

The term 'processing' may include Glencross Cleaning Limited obtaining, recording or holding the information or data or carrying out any set of operation or operations on the information or data, including organising, altering, retrieving, consulting, using, disclosing or destroying the information or data. Glencross Cleaning Limited will adopt appropriate technical and organisational measures to prevent the unauthorised or unlawful processing or disclosure of data.

Data, personal information and records - The Information Glencross Cleaning Limited Holds

The data held for each CCBR is variable depending on the nature of the relationship, details are broadly listed below. This data allows us to maintain effective records and ensure operational consistency.

- **personal details** – name, address, emergency contact,
- **contract history with the organisation** – date contract began, amendments and alterations, present operational duties.
- **details of terms and conditions**, billing and invoicing records, payment records, complaints record. Copies of any letters recording changes / addendums to the contract.
- **details of any accidents** occurring as part of the contract cleaning, including for our cleaners on the way to and from work. Certain accidents must be reported to relevant authorities for health and safety purposes.
- **details of termination of contract.**

Why this personal data is held

Glencross Cleaning Limited complies with its' legal obligations to process data and hold personal information for the following reasons:

- To agree a business contract.
- To enable effective communication with CCBRs.
- To comply with a legal obligation.
- To carry out a task in the public interest, or in exercising official authority vested in Glencross Cleaning Limited.
- To protect the legitimate interests of Glencross Cleaning Limited or a third party, except where this is overridden by the legal rights of another.

How personal data is processed

- Access to any data within our business is handled in accordance with data protection rules and all personal and business information is handled with respect.
- Only relevant information is retained; any information that is out of date or is not required for a genuine business reason will be deleted.
- Any personal information you provide will be held securely and your personal or business information will not be sold or traded to third parties.
- There may be instances when the business is legally required to disclose information, for example informing the Inland Revenue about payments made or in response to a regulator or other authority. Having verified the request, the information disclosed will be limited to the specific information requested and no more.
- At the end of a business contract, your data will be retained for a period of 6 years; this is in accordance with statutory retention periods. Once this period has expired records will be securely disposed of.

How personal data is stored and who has access to it

- All CCBR records are stored in electronic form in password encrypted files on the company's main computer server in compliance with legislation.

- Any paper copies of CCBR data are stored in a secure filing system in compliance with legislation. This includes but is not limited to copies of the contract, invoice and payment details, business cards etc.
- CCBRs contact phone numbers are stored in a password protected company mobile phone to enable easy telecommunications and digital communications via WhatsApp, text messenger and other digital platforms as required.
- Access to data is given to the following people
 - company director(s)
 - line and company manager(s)
 - other field and office-based staff for which it is pertinent to their role and/or overall business continuity

How data is removed and destroyed

After data has expired according to required storage time and no longer needs to be stored by Glencross Cleaning Limited, all digital files will be removed from the server, any paper copies will be permanent destroyed and telephone number removed from the company mobile phone.

How data breaches are reported

- All breaches or suspected breaches of data will be reported to the company Director(s) who will take the required action.
- Where necessary Glencross Cleaning Limited will notify the ICO within 72 hours of any breach of data as compliant with legislation.
- Where necessary individuals whose personal data has been compromised will be made aware of the breach without any undue delay in compliance with legislation.
- The company will keep a record of any personal data breaches, regardless of whether notification of the breach is required.

Other points to note regarding your individual employee rights

Your rights under GDPR as a CCBR are detailed below. Glencross Cleaning Limited is fully compliant regarding all aspects of the new regulations:

- CCBRs have the **right to be informed** about the collection and use of their personal data. This is a key transparency requirement under the GDPR and is the purpose of this briefing document.
- CCBRs continue to have a **right of access** to their personal data and supplementary information; GDPR regulations state that information must be provided within 40 days of a request; requests must be made in writing.
- Should a data discrepancy arise, or information is potentially incomplete, CCBRs have the **right to request rectification**. If the request is founded, then the data will be corrected or completed one month from the date of request.
- **Data Portability** is a new right and applies only to data processed by automatic means and when it is either explicitly provided by you e.g. when you fill in a form online; it does not include paper files. The right to data portability allows individuals to obtain and reuse their personal data and allows data to be moved, copied or transferred easily from one IT environment to another, in a safe and secure way. The intention is to give individuals more control over their personal data.
- GDPR introduces a right for individuals to have personal data erased which is also known as **the right to be forgotten**. This right is not absolute and only applies in certain circumstances. Individuals can make a request for erasure verbally or in writing, a response will be given within one month.