

QUALITY MANAGEMENT SYSTEM & ISO 9001:2015**DATA PROTECTION****DATA PROTECTION ACT 2018 - POLICY**

The company's policy, as set out below, is based closely on the guidance for small businesses, issued by the Information Commissioner's Office (ICO). It is the company's policy to adhere to the requirements of the Data Protection Act so far as they are applicable to our industry and our business.

It should also be noted that:

- The company reviewed and implemented the '12 steps to take now' recommendations given out in the ICO advisory document issued in 2017 (Version 2.0) In connection with GDPR and as a preliminary to the introduction of the 2018 Data Protection Act ('DPA').
- The company has in place, to complement / supplement this policy, a separate documentation set to cover the requirements for 'Information Management & Security', comprising:
 - Information Management & Security Policy
 - Information Management & Security System Description Manual
 - Information Management & Security Processes & Procedures Manual

What's the Data Protection Act (DPA) all about ?

The DPA aims to promote high standards in the handling of personal information, and so to protect the individual's right to privacy. It applies to anyone holding information about living individuals in electronic format and in some cases on paper. The eight data protection principles of good information handling, as listed below, must be followed and we ensure that all our staff do follow them. These principles are central to the DPA, and everyone who handles personal information must abide by them. We also audit ourselves against the simple checklist provided by the ICO.

Personal information must be:

- Fairly and lawfully processed
- Processed for specified purposes
- Adequate, relevant and not excessive
- Accurate, and where necessary, kept up to date
- Not kept for longer than is necessary
- Processed in line with the rights of the individual
- Kept secure
- Not transferred to countries outside the European Economic Area unless there is adequate protection for the information

As a company, we hold information about individuals who are Clients, employees, suppliers, clients or other members of the public.

The DPA requires the Information Commissioner to maintain a Register of data controllers and the purposes for which they use personal information. This process is known as

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notification. Not all data controllers are required to notify. Broadly speaking data controllers are those who are responsible for processing personal information. We have voluntarily 'notified' i.e. registered with the Information Commissioner's Office (ICO) because as a company specializing in security services, we recognised that because we do hold, maintain and process certain personal and confidential information, we are legally obliged to register.

The DPA also gives us all as individuals certain rights, including the right to see information that is held about us and to have it corrected if it's wrong. For further information on the rights of individuals we always refer our employees and other stakeholders to the Data Protection section of the ICO website or to ask ICO for the "Using the Law to protect your Information" leaflet.

As a business we also recognize that it makes good business sense to operate good information management principles e.g.

- Good information handling can enhance our business's reputation by increasing Client and employee confidence in us
- Good information handling reduces the risk of a complaint being made against us

What if someone asks for their information?

Individuals have a right under the DPA to have a copy of the information held about them on computer and in some manual filing systems. This is known as the right of subject access. If we do receive a subject access request, we **will** deal with it promptly, and in any case within 40 days of the date of receiving it. We will send the individual a copy of the personal information you hold on them, and certain other details of your processing. The ICO allows an organization to charge a fee of up to £10 for responding to an information request and we make this known to the individual.

This policy will be reviewed annually as a minimum and, if necessary, reviewed and revised at other appropriate times in the light of circumstances, legislative, regulatory or organisational changes and we aim to continually improve our performance in data protection management.

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