carpenters group

Data Protection Policy

Introduction

Carpenters Limited (and all group companies) are required to process personal and special category data about living individuals for the purposes of satisfying operational and legal obligations. Carpenters recognises the importance of the correct and lawful treatment of personal data concerning clients, current employees and/or potential employees. We are registered with the UK Supervisory Body, the Information Commissioner's Office ("ICO"), number ZA147287.

This personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in both the Data Protection Act 2018 and the General Data Protection Regulation.

Carpenters Group fully endorse and adhere to the six data Principles. These Principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transporting, and storing personal data and they are the first point of consideration for the regulator when assessing compliance.

Principles

The principles require that processing of personal data shall:

- be lawful and fair;
- be specified, explicit and legitimate;
- be adequate, relevant and not excessive;
- be accurate and kept up to date;
- be kept for no longer than is necessary;
- be processed in a secure manner.

Reporting Breaches

Breaches of our Data Protection Policy or procedures must be reported **verbally** to the Risk & Compliance Department **immediately** (ext. 3463 or 3574) or to Dave McCready (ext. 3387) and followed up using the form on the R&C intranet or from GDPR intranet page. You will then be required to complete an internal Breach Reporting Form. If we need to report a breach to the ICO, we must do so within 72 hours so it is essential that you know and follow the process. The fines are up to €20 or 4% of turnover.

Individual Rights

All individuals, whether clients or employees, have controls and rights as to how their data is processed. We operate an Individual Rights Policy (see GDPR on the intranet). These are:

1. The right to be informed;
2. The right of access (called a subject access request, see below);
3. The right to rectification (updated);
4. The right to erasure;
5. The right to restrict processing;
6. The right to data portability;
7. The right to object;
8. Rights in relation to automated decision making and profiling (we do not do this).

These rights are subject to our obligations under regulation and/or legislation.

Information Security

Carpenters are accredited with ISO 27001 Data Security accreditation. You can contact David McCready who has responsibility for data security management / ISO27001.

Subject Access Request

There is no charge for doing this and there is a process within VF legal and insurance from the file cover (see GDPR section of the intranet).

Employees and other subjects of personal data held by Carpenters have the right to access any personal data that is being kept about them. This is relevant to paper based information and computer based records. This right is subject to certain exemptions which are set out in the Data Protection Act. Any person who wishes to exercise this right should make the request in writing to the Data Protection Officer, Maria Rodman.

Carpenters aim to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days of receipt of a request unless there is good reason for delay. In such cases, the reason for delay or exemption to compliance will be explained in writing to the individual making the request.

Data Security
The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted to relevant and authorised parties. All staff are responsible for ensuring that any personal data held is kept securely; personal information is not disclosed either orally, in writing or otherwise to any unauthorised third party without consent to do so.

All incoming and outgoing calls that involve client information must go through our Data Protection checks before the claim can be discussed. This relies on checking being made for all incoming and outgoing calls that involve client information. Our checks are system driven and must be followed. If any suspicions are held in the course of undertaking these checks, you must terminate the call. MI is obtained on system DPA.

Lawful Processing
All clients will receive our Fair Processing Notice setting out how we will use their data. Where we process special category data which is medical/health information, we obtain specific consent. Processing may be necessary to operate policies, such as health and safety and equal opportunities.

Retention of Data
Carpenters Group will keep some forms of information for longer than others according to statutory or regulatory requirements. The company maintains a Data Retention Policy which sets out the requirements.

Client Breaches
Any breach of the Data Protection Policy will be taken seriously and may result in formal action against any member of staff who is found to be negligent or acting criminally in the handling of any personal data. Any breach of data will be fully investigated and reported to any clients affected as soon as possible.

Training
We provide training on data protection and information security at induction, annual refresher basis and as required when internal policies, processes and/or legislation changes. If you have not received this or just want more training, let your manager know or contact the training department.

Data Protection Officer
The Data Protection Officer is responsible for ensuring compliance with Data Protection regulations and implementation of this policy on behalf of the firm.

The Data Protection Officer, Maria Rodman, Carpenters, Leonard House, Scotts Quays, Birkenhead, CH41 1FB mro@carpentersgroup.co.uk

Any questions or concerns about the interpretation or operation of this policy should be taken up in the first instance with the Data Protection Officer.