

carpenters group

Data Protection Policy

Version: 21
Owner: Holly Houghton
Dept: Risk & Compliance
Audience: Internal
Classification: **Carpenters Confidential**

Introduction

Carpenters Group is 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. Carpenters are registered with the UK Supervisory Body, the Information Commissioner’s Office (“ICO”), with the following registrations:

- Carpenters Limited number ZA147287.
- Carpenters Insurance Services Limited ZA108322.
- Carpenters Scotland ZA517799

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Objective

The purpose of this Policy is to ensure that all personal and special category data held by Carpenters Group—whether on paper, computer, or other media—is processed with the highest standards of legal compliance and security, as required by the Data Protection Act 2018 and UK General Data Protection Regulation. This includes maintaining confidentiality and appropriate safeguards at all times, especially when engaging in agile working or

remote environments, in accordance with the company's health and safety, data protection, and confidentiality policies.

Data Protection Principles

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.

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.

Relevant Legislation

This policy fulfils our requirements of the Data Protection Act 2018 and UK General Data Protection Regulation.

Scope

This policy is applicable to all Carpenters Group entities, locations, colleagues, systems, data, and data processing assets.

Definitions

Personal Data

'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Special Category Data

The UK GDPR defines special category data as:

- personal data revealing racial or ethnic origin;
- personal data revealing political opinions;
- personal data revealing religious or philosophical beliefs;
- personal data revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life; and
- data concerning a person's sexual orientation.

Source: <https://ico.org.uk/>

Reporting Breaches

Breaches of our Data Protection Policy or procedures must be reported to the Risk & Compliance Department immediately using the form available on the Risk and Compliance section of the IT Service Desk. 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 data protection on the intranet). These are:

- The right to be informed;
- The right of access (called a subject access request, see below);
- The right to rectification (updated);
- The right to erasure;
- The right to restrict processing;
- The right to data portability;
- The right to object;
- 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 Mandy Ryan 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 the data protection 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 Risk and Compliance Team.

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.

Employee Responsibilities

All employees must ensure that:

- any personal data they are given is updated via the Individual Rights process;
- they attend any training as required;
- they immediately report any actual or potential breaches;
- take care to ensure that all documentation is accurate, relevant and sent to the correct recipient.

All employee-related data must be provided to HR for storing centrally by HR to ensure we have an accurate record.

Recording

It is illegal to covertly record other individuals without their knowledge.

It is a breach of the firm's DPA Policy to make any recordings in the office either visually or audibly for any purpose. The only exception is if in the unlikely event that you felt your own personal safety was at risk. This is on any device whether your own or belonging to the firm. Any incidents of this nature will be treated as a disciplinary offence which could result in dismissal for gross misconduct.

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.

Employees are reminded that all Carpenters business must be kept confidential. All employees are accountable for their actions and must not either take files out of the office (unless with Head of Department approval for a specific reason) or send company/client data to their personal email address(es) or to that of a third party who is not involved in either the business or the claim.

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.

If a client calls and you do not have access to the system, before discussing the claim, we would request that they provide:

- their full address;
- their date of birth;
- a contact number or email address or occupation.

We must not divulge any information to them; they must give it to us.

If an Insurer calls we must obtain:

- the names of the parties;
- the date of the accident;
- our client's registration and their insured's registration.

There is a set procedure to be followed within our case management system.

Lawful Processing

All clients will receive our Privacy 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.

Compliance, Monitoring and Enforcement

Any employee who considers that the policy has not been followed in respect of their own personal data should raise the matter with their Line Manager or the Data Protection Officer in the first instance.

Failure to comply with company policy and procedures may result in disciplinary proceedings against an employee.

Training and awareness

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.

Monitoring and Enforcement

For example, compliance with this policy is mandatory for all stakeholders. We actively monitor any policy violations, and such breaches may be managed by our disciplinary policy.

Key Performance Indicators (KPIs) and Reporting

The key requirements of this policy form part of the [ISO 27001 / ISO 22301 / Internal Audit Program]

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.

Holly Houghton is the firm's Data Protection Officer - riskandcompliance@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.

Approval

All policy changes must be approved by Holly Houghton.

Version control

V#	Date	Author	Change Description	Approved By
1.0	07/12/2012	Angela Coggins	Document Creation	Peter Adlard
2.0	03/01/2014	Maria Rodman	Review and Updated	Maria Rodman
3.0	19/03/2014	Maria Rodman	Updated Breach Reporting	Maria Rodman
4.0	05/12/2014	Maria Rodman	DPA Officer / systems updates	Maria Rodman
5.0	12/06/2015	Maria Rodman	Review/update	Maria Rodman
6.0	29/11/2016	Robyn O'Grady	Review/update contact details	Maria Rodman
7.0	28/11/2016	Robyn O'Grady	Carpenters Limited Update	Maria Rodman
8.0	04/12/2017	Robyn O'Grady	Review	Maria Rodman
9.0	24.05.2018	Maria Rodman	Updated 2018 Act	Maria Rodman
10.0	09.04.2019	Robyn O'Grady	Review and branding	Maria Rodman

11.0	14.11.2019	Robyn O'Grady	Recording section/branding	Maria Rodman
12.0	13.01.2020	Robyn O'Grady	Update regarding confidentiality	Maria Rodman
13.0	28.10.2020	Robyn O'Grady	Contact information update	Maria Rodman
14.0	24.09.2021	Robyn O'Grady	Annual review	Maria Rodman
15.0	16.02.2022	Robyn O'Grady	Owner Update/ Definitions	Maria Rodman
16.0	25.03.2023	Robyn O'Grady	Updated contacts, removed exts, renewal ICO	Maria Rodman
17.0	15.09.2023	Robyn O'Grady	Owner/Contact update	Alan Hayes
18.0	19.02.2024	Robyn O'Grady	Contact update	Holly Houghton
19.0	17.06.2024	Robyn O'Grady	Update to introduction	Holly Houghton
20.0	19.08.2024	Holly Houghton	Update to DPO and ICO registrations.	Holly Houghton
21.0	August 2025	Holly Houghton	Annual Review – small grammatical changes	Holly Houghton