



## Data Protection Policy



<b>Policy information</b>	
<b>Organisation</b>	Duscovent Engineering Limited 86 Wellington Road North Heaton Norris Stockport Cheshire SK4 1HT Telephone; 0161 480 4811 Email; sales@duscovent.co.uk
<b>Scope of policy</b>	The policy applies to Duscovent Engineering Limited and its UK based business which the Data Controller is responsible for.  Duscovent Engineering Limited Data Protection Officer is Mike Jones, Projects Director and can be contacted at <a href="mailto:mike@duscovent.co.uk">mike@duscovent.co.uk</a>
<b>Policy operational date</b>	25 May 2018
<b>Policy prepared by</b>	Mike Jones, Projects Director, Duscovent Engineering Limited
<b>Date approved by the Directors</b>	25 May 2018
<b>Policy review date</b>	25 May 2021

<b>Introduction</b>	
<b>Purpose of policy</b>	<ul style="list-style-type: none"> <li>• complying with the law</li> <li>• following good practice</li> <li>• protecting clients, staff and other individuals</li> <li>• protecting the organisation</li> </ul>
<b>Types of data</b>	<p>Duscovent Engineering Limited collect personal data for the day to day operation of its business, this will include;</p> <ul style="list-style-type: none"> <li>• employees personal data</li> <li>• clients contract data – including financial</li> <li>• suppliers/sub-contractors contract data – including financial</li> </ul> <p>The data that we collect will not be shared with any third party</p>
<b>Policy statement</b>	<p>Duscovent Engineering Limited have a commitment to:</p> <ul style="list-style-type: none"> <li>• comply with both the law and good practice</li> <li>• respect individuals’ rights</li> <li>• be open and honest with individuals whose data is held</li> <li>• provide training and support for staff who handle personal data, so that they can act confidently and consistently</li> <li>• Notify the Information Commissioner voluntarily, even if this is not required</li> <li>• The data that we collect will not be shared with any third party</li> </ul>
<b>Key risks</b>	<p>Duscovent Engineering Limited have identified the main risks within our organisation in two key areas:</p> <ul style="list-style-type: none"> <li>• information about data getting into the wrong hands, through poor security or inappropriate disclosure of information</li> <li>• individuals being harmed through data being inaccurate or insufficient</li> </ul>

<b>Responsibilities</b>	
<b>The Company Directors</b>	They have overall responsibility for ensuring that the organisation complies with its legal obligations.
<b>Data Protection Officer</b>	<p>Mike Jones, Projects Director is the DPO for Duscovent Engineering Limited. His responsibilities include:</p> <ul style="list-style-type: none"> <li>• Briefing the Board on Data Protection responsibilities</li> <li>• Reviewing Data Protection and related policies</li> <li>• Advising other staff on tricky Data Protection issues</li> <li>• Ensuring that Data Protection induction and training takes place</li> <li>• Notification to the ICO</li> <li>• Handling subject access requests</li> <li>• Approving unusual or controversial disclosures of personal data</li> <li>• Approving contracts with Data Processors</li> </ul>
<b>Employees &amp; Volunteers</b>	All staff and volunteers should be required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work. (From now on, where 'employees' is used, this includes both paid employees and volunteers.)
<b>Enforcement</b>	<p>There are penalties for infringing the Data Protection and related policies.</p> <p>Staff will be fully trained and aware of how to deal with confidential data and how to report breaches.</p>

<b>Security</b>	
<b>Scope</b>	Data Security is not wholly a Data Protection issue. Business Continuity is included in respect of financial operation and good conduct.
<b>Business continuity</b>	This includes backup procedures (both for data and for key employee availability) and emergency planning.
<b>Specific risks</b>	<p>Increased special precautions will be taken when information is in particularly risky situations, such as being worked on at home, with clients, at meetings, etc.</p> <p>"vishing" and "phishing" - where employees are tricked into giving away information over the phone or by email is notably on the increase and all Duscovent employees are extra vigilant to be aware of these tactics</p>

<b>Data recording and storage</b>	
<b>Accuracy</b>	Data accuracy is most important for the day to day operation of our business. For example, where information is taken over the telephone, it will be checked back with the individual to ensure accuracy.
<b>Updating and Retention periods</b>	The majority of information is retained in line for 7 years, which covers the 6 years by law in which we have to keep certain information for a minimum of 6 years plus the current year. Data that is no longer necessary will be deleted. Under our retention policy, there are certain exemptions in relation to financial and health data.

<b>Right of Access</b>	
<b>Responsibility</b>	Mike Jones, Projects Director, is responsible for ensuring that right of access requests are handled within the legal time limit which is one month
<b>Procedure for making request</b>	Right of access requests must be in writing, either hard copy or email. You have a right to request a copy of the personal data that we hold about you. If you would like a copy of some, or all of your personal data please email <a href="mailto:mike@ducovent.co.uk">mike@ducovent.co.uk</a>
<b>Provision for verifying identity</b>	Where the person managing the access procedure does not know the individual personally there will be provision for checking their identity before handing over any information
<b>Charging</b>	The information will be supplied free of charge.  However there may be a charge of a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.  There may also be a charge of a reasonable fee to comply with requests for further copies of the same information. This does not mean that there will be a charge for all subsequent access requests.  The fee will be based on the administrative cost of providing the information
<b>Procedure for granting access</b>	If the request is made electronically, we will provide the information in a commonly used electronic format.

<b>Transparency</b>	
<b>Commitment</b>	<p>Duscovent Engineering Limited has a commitment to ensuring that Data Subjects are aware that their data is being processed and</p> <ul style="list-style-type: none"> <li>• for what purpose it is being processed</li> <li>• what types of disclosure are likely, and</li> <li>• how to exercise their rights in relation to the data</li> </ul>
<b>Procedure</b>	<p>Data Subject can be informed of their data usage by:</p> <ul style="list-style-type: none"> <li>• the handbook for employees</li> <li>• during the initial meeting with clients/suppliers/sub-contractors</li> <li>• on the web site</li> </ul>

<b>Lawful Basis</b>	
<b>Underlying principles</b>	<p>GDPR and the Data Protection Act 2018 states that Duscovent Engineering Limited, as the data processor must record the lawful basis for the personal data we hold.</p> <p>Employee data is retained for pay and employment law compliance.</p> <p>Clients and Suppliers/Sub-Contractors information is retained for financial payment and invoicing of contracts and it is understood that consent to use this information is given by entering into the contract.</p>
<b>Opting out</b>	<p>Even where Duscovent Engineering Limited is not relying on consent, we wish to give people the opportunity to opt out of their data being used in particular ways. If so, please contact us directly.</p>
<b>Withdrawing consent</b>	<p>Duscovent Engineering Limited wish to acknowledge that, once given, consent can be withdrawn, but not retrospectively. There may be occasions where the organisation has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn</p>

<b>Employee training &amp; Acceptance of responsibilities</b>	
<b>Induction</b>	All employees who have access to any kind of personal data will have their responsibilities outlined during their induction procedures
<b>Continuing training</b>	If there are opportunities to raise Data Protection issues during employee training, team meetings, supervisions, etc. the issues will be fully explored and discussed.
<b>Procedure for staff signifying acceptance of policy</b>	Employees will show acceptance of their responsibilities to Data Protection by the signing of the employee handbook. The policy is included in the Company Handbook.

<b>Policy review</b>	
<b>Responsibility</b>	Mike Jones, Projects Director, will carry out a policy review prior to 25 May 2018
<b>Procedure</b>	The Directors and Office Manager will be consulted during the review of the policy.
<b>Timing</b>	The policy review should be undertaken 30 days prior to the end of the existing policy