



Data Protection Policy (POL004) – GDPR

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Responsibility – Alan Goodwin, Data Protection Policy

1. Rationale

RevingtonTR Limited is committed to a policy of protecting the rights and privacy of individuals, including members, staff and others, in accordance with the General Data Protection Regulation (GDPR) May 2018.

The new regulatory environment demands higher transparency and accountability in how membership organisations use personal data. It also accords new and stronger rights for individuals to understand and control that use.

The GDPR contains provisions that RevingtonTR Limited will need to be aware of as data controller and processor, including provisions intended to enhance the protection of members' Personal data. For example, the GDPR requires that:

We must ensure that our privacy notices are written in a clear, plain way that staff and customers will understand.

RevingtonTR Limited needs to process certain information about its staff and customers and others with whom it has a relationship for various purposes such as, but not limited to:

1. The recruitment and payment of staff.
2. The administration of services.
3. Provide delivery of services and goods.
5. Recording personal details for legal and contractual obligations.
6. Collecting fees.
7. Complying with legal obligations to funding bodies and government including local government.

To comply with various legal obligations, including the obligations imposed on it by the General Data Protection Regulation (GDPR) RevingtonTR Limited must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

2. Compliance

This policy applies to all Staff and Members of RevingtonTR Ltd. Any breach of this policy or of the Regulation itself will be considered an offence and the disciplinary procedures will be invoked.

As a matter of best practice, other agencies and individuals working with RevingtonTR Limited and who have access to personal information, will be expected to read and comply with this policy. It is expected that departments who are responsible for dealing with external bodies will take the responsibility for ensuring that such bodies sign an agreement to abide by this policy.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments to the GDPR and other relevant legislation.

3. General Data Protection Regulation (GDPR)

This piece of legislation comes in to force on the 25th May 2018. The GDPR regulates the processing of personal data, and protects the rights and privacy of all living individuals (including children), for example by giving all individuals who are the subject of personal data a general right of access to the personal data which relates to them. Individuals can exercise the right to gain access to their information by means of a 'subject access request'. Personal data is information relating to an individual and may be in hard or soft copy (paper/manual files; electronic records; photographs; CCTV images), and may include facts or opinions about a person.

For more detailed information on these Regulations see the Data Protection Data Sharing Code of Practice (DPCoP) from the Information Commissioner's Office (ICO). Please follow this link to the ICO's website (www.ico.gov.uk)

4. Data Protection Principles

The legislation places a responsibility on every data controller and data processor to process any personal data in accordance with the eight principles. More detailed guidance on how to comply with these principles can be found in the DPCoP. Please follow this link to the ICO's website (www.ico.gov.uk) In order to comply with its obligations, RevingtonTR Ltd undertakes to adhere to the eight principles:

1) Process personal data fairly and lawfully.

RevingtonTR Limited will make all reasonable efforts to ensure that individuals who are the focus of the personal data (data subjects) are informed of the identity of the data controller/ data processor , the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

2) Process the data for the specific and lawful purpose for which it collected that data and not further process the data in a manner incompatible with this purpose.

RevingtonTR Limited will ensure that the reason for which it collected the data originally is the only reason for which it processes those data, unless the individual is informed of any additional processing before it takes place

3) Ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed.

RevingtonTR Limited will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained. Forms for collecting data will always be drafted with this mind. If any irrelevant data are given by individuals, they will be destroyed immediately.

4) Keep personal data accurate and, where necessary, up to date.

RevingtonTR Limited will review and update all data on a regular basis. It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and each Individual should notify RevingtonTR Limited if, for example, a change in circumstances mean that the data needs to be updated. It is the responsibility of RevingtonTR Limited to ensure that any notification regarding the change is noted and acted on.

5) Only keep personal data for as long as is necessary.

RevingtonTR Limited undertakes not to retain personal data for longer than is necessary to ensure compliance with the legislation, and any other statutory requirements. This means RevingtonTR Limited will undertake a regular review of the information held and implement a weeding process.

RevingtonTR Limited will dispose of any personal data in a way that protects the rights and privacy of the individual concerned (e.g. secure electronic deletion, shredding and disposal of hard copy files as confidential waste). A log will be kept of the records destroyed.

6) Process personal data in accordance with the rights of the data subject under the legislation.

Individuals have various rights under the legislation including a right to:

- be told the nature of the information RevingtonTR Limited holds and any parties to whom this may be disclosed.
- prevent processing likely to cause damage or distress.
- prevent processing for purposes of direct marketing.
- be informed about the mechanics of any automated decision making process that will significantly affect them.
- not have significant decisions that will affect them taken solely by automated process.
- sue for compensation if they suffer damage by any contravention of the Legislation.
- take action to rectify, block, erase or destroy inaccurate data.
- Request that the Office of the Information Commissioner assess whether any provision of the Act has been contravened.

RevingtonTR Limited will only process personal data in accordance with individuals' rights.

7) Put appropriate technical and organisational measures in place against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data.

All members of staff are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties.

RevingtonTR Limited will ensure that all personal data is accessible only to those who have a valid reason for using it.

RevingtonTR Limited will have in place appropriate security measures examples include but are not limited to:-

- keeping all personal data in a lockable cabinet with key-controlled access.
- Password protecting personal data held electronically.
- Holding all Customer data on secure systems.
- Ensuring any data sent to third parties for the purposes of administering order processing or employee administration e.g. payroll is sent in a secure manor.
- archiving personal data which are then kept securely.
- deleting aged/ irrelevant data/ incorrect data.

- placing any PCs or terminals, CCTV camera screens etc. that show personal data so that they are not visible except to authorised staff.
- ensuring that PC screens are not left unattended without a password protected screen-saver being used.

In addition, RevingtonTR Limited will put in place appropriate measures for the deletion of personal data - manual records will be shredded or disposed of as 'confidential waste' and appropriate contract terms will be put in place with any third parties undertaking this work. Hard drives of redundant PCs will be wiped clean before disposal or if that is not possible, destroyed physically. A log will be kept of the records destroyed.

This policy also applies to staff and third parties who process personal data 'off-site', e.g. when working at home, and in circumstances additional care must be taken regarding the security of the data.

8) Ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

RevingtonTR Limited will not transfer data to such territories without the explicit consent of the individual.

This also applies to publishing information on the Internet - because transfer of data can include placing data on a website that can be accessed from outside the EEA - so RevingtonTR Limited will always seek the consent of individuals before placing any personal data (including photographs) on its website.

If RevingtonTR Limited collects personal data in any form via its website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.

5. Consent as a basis for processing

Within the requirements of GDPR we will be storing your data and communicating with you using "Legitimate Interest" and associated tests to meet the requirement. (See the ico link below for more information). This is due to the historic relationship we have with each other and the business we conduct with you balanced against the risks of holding the required information and the marketing we send to you.

RevingtonTR Limited will ensure that any forms used to gather data on an individual will contain a statement (fair collection statement) explaining the use of that data, how the data may be disclosed and also indicate whether or not the individual needs to consent to the processing.

RevingtonTR Limited will ensure that if the individual does not give his/her consent for the processing, and there is no other lawful basis on which to process the data, then steps will be taken to ensure that processing of that data does not take place.

6. Subject Access Requests

Individuals have a right to access any personal data relating to them which are held by RevingtonTR Ltd. Any individual wishing to exercise this right should apply in writing to info@revingtontr.com. Any member of staff receiving a request should forward this to Alan Goodwin.

Under the terms of the legislation, any such requests must be complied with within 30days.

7. Disclosure of Data

Only disclosures which have been notified and agreed with the approved and authorised third parties must be made and therefore staff should exercise caution when asked to disclose personal data held on another individual or third party.

RevingtonTR Limited undertakes not to disclose personal data to unauthorised third parties.

Legitimate disclosures may occur in the following instances:

- the individual has given their consent to the disclosure.
- the disclosure is in the legitimate interests of the customer or employee.
 - the disclosure is required for the performance of a contract.
 - The disclosure is a legal obligation.
 - The disclosure is the public interest.

In no circumstances will RevingtonTR Limited sell any of its databases to a third party.

8. Related Documents

POL004-1 Employees, Workers, Contractors

POL004-1-1 Employee (Abridged)

POL004-2 Customer (Abridged)

POL004-3 Retention Policy

POL004-4 Legitimate Interest Test