

Data Protection Policy

The security and privacy of your data is taken seriously by the Company, but we need to gather and use information, or 'data', about you as part of our business and to manage our relationship with you. The Company is a 'data controller' for the purposes of your personal data. We are committed to complying with all our data protection legal obligations regarding how we obtain, handle, process or store personal data.

Our Data Protection policy applies to current and former employees, workers, volunteers, interns, contractors, apprentices and consultants. If you fall into one of these categories, you are a 'data subject' for the purposes of this policy. You should read this policy alongside your contract of employment (or contract for services), our Privacy Notice, IT policy and any other notice we issue to you from time to time in relation to your data. Any breach of this policy may result in disciplinary action being taken up to and including dismissal. A copy of these can be obtained from the person responsible for data in the Company.

We have taken steps to protect the security of your data in accordance with our Data Protection policy. We train staff about their data protection responsibilities as part of the induction process. We will only hold data for as long as necessary for the purposes for which we collected it.

This policy does not form part of your contract of employment (or contract for services, if relevant) and can be amended by the Company at any time.

Data Protection Principles

Personal data must be processed in accordance with six 'Data Protection principles. It must be:

- Processed fairly, lawfully and transparently.
- Collected and processed only for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary for the purposes for which it is processed.
- Accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay.
- Not kept for longer than is necessary for the purposes for which it is processed.
- Processed securely.

How we define personal data

'Personal data' means information which relates to a living person who can be identified from that data (a 'data subject') on its own, or when taken together with other information which is likely to come into our possession. Personal data includes any expression of opinion about the person and an indication of the intentions of us or others in respect of that person. It applies to data stored electronically, on paper or other materials, but does not include anonymised data.

The types of personal data we collect and use about you is included in the Privacy Notice that is issued with your contract of employment.

How we collect your information.

We collect information-

- Through our website
- Over the Phone

- Via email enquiries
- Via purchased databases

Documentation

- ✘ We retain client contact details in our Accounts system
- ✘ We have a customer database
- ✘ We have a server for stored emails and files
- ✘ Any personal data processed by us is incidental to the services we provide; the primary purpose is not to process personal data.

What information we collect?

- ✘ Generally, we retain name, company name, address, telephone and email address.

How do we use this information?

The information collected is used in two ways. If our contact with you goes no further than a meeting and quotation, this information is archived in a secure file in compliance with the GDPR legislation requirements relating to information management. If your enquiry leads to you working with us, your data will be used to assist with our service to you and be entered into our accounts system.

Special categories of personal data

These may be processed for monitoring equal opportunities, managing your absence or complying with deductions from payroll, among other reasons. These categories are defined below and are detailed in your Privacy Notice:

- ✘ Your racial or ethnic origin.
- ✘ Your political opinions.
- ✘ Your religious or philosophical beliefs.
- ✘ Your trade union membership.
- ✘ Your genetic or biometric data.
- ✘ Your health.
- ✘ Your sex life and sexual orientation.
- ✘ Any criminal convictions and offences.

How and Why We Process Your Data

‘Processing’ the data that we hold includes collection, recording, organisation, structuring or storage, adapting, retrieving, disseminating, aligning and removing or erasing it.

The Company will process your personal data if it is needed to perform the contract of employment (or services) between us or to comply with any legal obligation, or if it is necessary for our legitimate interests (or for the legitimate interests of someone else). The Privacy Notice covers the reasons for collecting and processing your data, and when and who we share it with. We can process your personal data for these purposes without your knowledge or consent. However, we will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it. We will only process special categories of your personal data in certain situations in accordance with the law.

We do not take automated decisions about you using your personal data or use profiling in relation to you.

Sharing Your Personal Data

Sometimes we might share your personal data with group companies or our business partners, contractors and agents to carry out our obligations under our contract with you or for our legitimate interests; these parties are required to hold data legally and confidentially. These parties are detailed in your Privacy Notice.

We do not send your personal data outside the European Economic Area. If this changes, you will be notified of this and the protections which are in place to protect the security of your data will be explained.

How You Should Process Personal Data for the Company

Everyone who works for, or on behalf of, the Company has some responsibility for ensuring data is collected, stored and handled appropriately, in line with this policy and the Company's IT policy.

You should only access personal data covered by this policy if you need it for the work you do for, or on behalf of, the Company and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained and follow the following principles:

- ❌ Do not share personal data informally; keep it secure and don't share it with unauthorised people.
- ❌ Regularly review and update personal data which you must deal with. Update us if your own contact details change.
- ❌ Do not make unnecessary copies or keep personal data. Dispose of any copies securely.
- ❌ Consider anonymising data or using separate keys/codes so that the data subject cannot be identified.
- ❌ Do not transfer personal data out of the European Economic Area except in compliance with the law and with authorisation of the person responsible for data in the Company.
- ❌ Lock drawers and filing cabinets. Do not leave papers with personal data lying about.
- ❌ Do not take personal data away from Company premises without authorisation.
- ❌ Ask for help from the person responsible for data in the Company if you are unsure about data protection or the IT Security Policy, or if you notice any areas we can improve upon.

How to Deal with Data Breaches

We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur, please inform your Manager immediately and keep any evidence you have in relation to the breach. We will take the appropriate action.

Subject Access Request (SAR)

Data subjects can make a 'Subject Access Request' ('SAR') to find out the information we hold about them. If you would like to make a SAR in relation to your own personal data, you should make this in writing to the person responsible for data in the Company. We will comply with all legal requirements. If you receive a SAR, please pass it on to the person responsible for data and ensure that you keep any information regarding it.

Your Data Subject Rights

The law provides clear rights regarding your data protection; a full list can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations, and on the route for you to make a complaint. The following are the key, but not exhaustive, list of rights:

- ❌ The right to information about what personal data we process: how and on what basis.

- ✘ The right to access your own personal data via a SAR.
- ✘ The right to correct any inaccuracies in your personal data, by contacting the person responsible for data in the Company.
- ✘ The right to request that we erase your personal data where we were not entitled under the law to process it - or where it is no longer necessary to process it for the purpose it was collected - and have access temporarily restricted. To do this, you should contact the person responsible for data in the Company.
- ✘ The right to object to data processing where we are relying on a 'legitimate interest' to do so, and you think that your rights and interests outweigh our own and you wish us to stop; or for use in direct marketing.
- ✘ The right to receive a copy of your personal data and to transfer your personal data to another data controller.
- ✘ The right to be notified of a data security breach concerning your personal data.
- ✘ The right not to give your consent for processing of personal data, or to withdraw this later by contacting the person responsible for data in the Company.

How is your information kept secure?

- ✘ All information that is gathered is used or archived is kept secure with a view to preventing any unauthorised access to your data. We have in place appropriate technical and organisational measures, to protect against unauthorised or unlawful processing or accidental loss, destruction or damage of data. We do not supply our data to any other companies without your specific consent.
- ✘ We have non-disclosure agreements in place in all our employee contracts, and all employees are obliged to maintain client confidentiality.

Consent

- ✘ Redstart and its employees will never pass your information to a third party without your consent.
- ✘ By providing us with your information you have consented for us to use it for the purposes above.
- ✘ If you wish to withdraw consent to us using your data for business purposes please contact us at info@redstartnw.com

How we use cookies

Cookies are small text files that websites save locally to your computer, which allow sites to store and use information during your visit. They can improve your experience when using a website by:

- ✘ Remembering preferences, so you don't have to keep re-entering your choices when you visit again
- ✘ Measuring how you use a site, so that changes can be made to ensure it meets your needs

None of our cookies used for our sites can be used to identify you personally. When you initially visit our website you will be asked specifically to allow us to use cookies or not.

You can set your browser to refuse all cookies or to indicate when a cookie is being sent, however some website features or services may not function properly without cookies.

Review

The Directors are responsible for reviewing this policy. You should direct any questions in relation to this policy or data protection any written requests to them.