

Coping Stones UK Ltd Data Protection Policy

Context & Overview:

Key Details:

- **Policy Prepared by:** *Emily Mason*
- **Approved by:** *Adam Green*
- **Policy Operational from:** *6th June 2017*
- **Next Review Date:** *6th June 2018*

Introduction:

Coping Stones UK Ltd need to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards - and to comply with the law.

Why this policy exists:

This data protection policy ensures Coping Stones UK Ltd:

- ***Complies with data protection law and follow good practice.***
- ***Protects the rights of staff, customers and partners.***
- ***Is open about how it stores and processes individuals data.***
- ***Protects itself from risks of a data breach.***

Data Protection Law:

The Data Protection Act 1998 describes how organisations - including Coping Stones UK Ltd - must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that data must:

- ***Be processed fairly and lawfully.***
- ***Be obtained only for specific, lawful purposes.***
- ***Be adequate, relevant and not excessive.***
- ***Be accurate and kept up to date.***
- ***Not be held for any longer than necessary.***
- ***Processed in accordance with the rights of data subjects.***
- ***Be protected in appropriate ways.***
- ***Not be transferred outside the European Economic Area (EEA), unless that country also ensures appropriate level of protection.***

People, risks and responsibilities:

This policy applies to:

- ***All locations of Coping Stones UK Ltd.***
- ***All employees and/or Volunteers of Coping Stones UK Ltd.***
- ***All contractors, suppliers and other people working on behalf of Coping Stones UK Ltd.***

It also applies to all data that the company holds relating to identifiable individuals, even if that data falls outside of the Data Protection Act 1998.

This can include:

- ***Names.***
- ***Postal Addresses.***
- ***Email Addresses.***
- ***Telephone Numbers.***
- ***....and any other personal data.***

Data Protection Risks:

This policy helps to protect Coping Stones UK Ltd from some very real data security risks, including:

- *Breaches of Confidentiality.*
- *Failing to offer choice.*
- *Reputational damage.*

Responsibilities:

Everyone who works for or with Coping Stones UK Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, the director has key areas of responsibility:

- *He/She is ultimately responsible for ensuring Coping Stones UK Ltd meets its legal obligations.*
- *He/She must keep up to date with data protection responsibilities, risks and issues.*
- *He/She must review the data protection policy.*
- *He/She must arrange data protection training and advice for those who must practice this policy.*
- *He/She must deal with "Subject Access Requests" from individuals.*
- *He/She must ensure all IT systems are secure.*
- *He/She must address any data protection queries.*

General Staff guidelines:

- *Only people able to access personal data covered by this policy should be those who need it for their work.*
- *Data should not be informally shared.*
- *Coping Stones UK Ltd will provide training and updates for employees to help them understand their responsibilities.*

- *Employees must keep all data secured, particularly using strong passwords.*
- *Personal data must not be disclosed to any unauthorised people.*
- *Data should be regularly reviewed and updated, if out of date and no longer required deletion/disposal in correct manner.*

Data Storage:

These rules describe how and where data should be safely stored. Questions about safe storage of data should be directed to Adam Green.

When data is stored on paper, it should be kept in a place where unauthorised people cannot have access to it.

These guidelines also apply to electronically stored data:

- *When not required, paper or files must be stored in a locked cupboard.*
- *Employees must make sure paper and print outs are not left where unauthorised people may see them.*
- *Data print outs must be shredded and disposed of securely when no longer required.*

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- *Data must be protected by strong passwords.*
- *Data stored on removable devices must be locked away when not in use.*
- *Data must only be stored on designated devices.*
- *Data must be stored on devices that are protected by approved security software and a firewall.*

Data Use:

Personal Data is of no use to Coping Stones UK Ltd unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- ***When working with personal data employees must always ensure computer screens are locked when left unattended.***
- ***Personal data must not be shared informally. In particular it should never be sent via email.***
- ***Data must be encrypted before being transferred electronically.***
- ***Personal Data must never be transferred out of EEA.***
- ***Employees should not have saved copies of personal data to their own computers.***

Data Accuracy:

The law requires Coping Stones UK Ltd to take reasonable steps to ensure data is up to date and accurate.

It is the responsibility of all employees who work with the data to take reasonable steps to ensure it is kept as up to date and accurate as possible:

- ***Data must be held in as few places as possible.***
- ***Employees should take every opportunity to ensure all data is updated.***
- ***Coping Stones UK Ltd will make it easy for data subjects to update the information we hold for them. For instance, via the company website.***
- ***Data must be updated when inaccuracies are discovered.***

Subject Access Requests(SAR):

All individuals who are the subject of personal data held by Coping Stones UK Ltd are entitled to:

- ***Ask what data is held for them and why.***
- ***Ask how to gain access to it.***
- ***Be informed how to keep it up to date.***
- ***Be informed of the companies data protection obligations.***

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests should be made by email to the director at ag.construction@icloud.com. The director will then provide a standard request form.

Individuals will be charged at £10 per SAR and the relevant data will aim to be provided within 14 days. The director will always identify anyone making an SAR before disclosing any information.

Disclosing Data for other reasons:

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without consent of the data subject.

Under these circumstances, Coping Stones UK Ltd will disclose requested data. However, the director will ensure the request is legitimate and seek assistance from the legal advisers where necessary.

Providing Information:

Coping Stones UK Ltd aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used.***
- How to exercise their rights.***

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

Coping Stones UK Ltd can provide you with a privacy statement upon request and a version should also be available on our website.