

DATA PROTECTION POLICY

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General Statement

Hooper Services Ltd is committed to protecting the rights and freedoms of clients, customers and employees by safely controlling and processing their data in accordance with all our legal obligations under the General Data Protection Regulation (GDPR).

Scope & Definition

We hold personal data about our employees, clients and other individuals for a variety of business purposes as follows:

Business Purposes – Means personal data which may be used by Hooper Services Ltd for:

- Personnel, administrative, financial, regulatory, payroll, and training purposes

Personal Data - Means any information relating to a person as categorised to include;

- **Client / Customer / Suppliers:** Address, phone numbers, email address.
- **Suppliers:** Address, phone numbers, email address, financial details (payment)
- **Employees:** Address, phone numbers, email address, educational background, financial details (payroll), qualifications, nationality and job history.

Special Categories of Personal Data - Includes;

- **Employees:** Physical or mental health, criminal offences.

General Policy Principles

Hooper Services Ltd makes every effort to comply with the following principles:

- To be lawful, fair, respectful and act with consent
- To be transparent
- To collect minimum data and only for a specific purpose
- To be accurate and up to date
- To store data only until necessary
- To ensure data is stored and disposed of safely and securely

This policy sets out how Hooper Services Ltd will protect personal data and will ensure that its employees, sub-contractors and suppliers understand the rules governing their use of the personal data to which they have access in the course of their work.

- Where appropriate the individual is made aware of a privacy notice at the time of collecting the personal data.
- No third parties will be used for collecting or processing personal data.

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- Client or customer data is only used for this business's marketing purposes having gained consent first.
- The business will **NOT** pass customer data to third parties for marketing purposes.
- The business as an employer will ensure that all personal data is stored in a safe, secure and lawful way.
- Any printed data will be shredded or destroyed securely when no longer needed.
- All electronic stored data will be correctly filed and kept up to date with any historical data removed.

Responsibilities

The levels of responsibility for data protection are as follows:

- The directors of Hooper Services Ltd have overall responsibility for compliance with GDPR.
- Tara Hooper is the Data Protection Officer and has day to day responsibility for compliance, ensuring all employees, sub-contractors and third parties service suppliers with controlled data access are aware of their obligations.
- Employees, Sub-contractors and third party service suppliers e.g. IT, H&S, HR, are aware of their responsibility and abide by this policy.

Rights of Individuals

- Right to be informed – *their data has been collected and for what purpose.*
- Right of access – *to their data.*
- Right to rectification – *to know their data is accurate & rectify mistakes.*
- Right to erase and be forgotten – *to ensure data is erased securely on request and when we no longer need it.*
- Right to restrict processing – *to know it is only used for the stated purposes.*
- Right to data portability – *to make personal data held available to the individual on request in a format they can handle.*
- Right to object – *to the use of personal data*
- Rights in relation to automated decision making and profiling – *Does not apply to this business*



Signed:

Date: 14 January 2021

Position: Director

Review Log & Revisions Record

	Additions / Revisions Made	Date	Made By
01	Issued as Draft	01/04/18	AML
02	Data Processing Officer changed to Data <u>Protection</u> Officer, added email footer text.	18/06/18	AML
03	URN added and control table	18/06/20	AML

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Data Register & Precautions

Client / Customer Personal Data

Data Held	Purpose	Format	Security
Name, address, phone, email	Business correspondence, appointments, quotes, estimates, invoicing, statutory permissions.	Customer Database (Digital) – Electronic Documents	Digital - Firewall & Anti-Virus Software. Computers are password protected
	Issued to team leaders to progress works	Printed Job Sheets	Hardcopy - Personally assigned to an individual. Returned to the office.
Quote Information – Value of the work, work history	Invoicing & Future Work Specification.	Digital & Printed Quote Sheets	Returned to the office. Archived securely
Property Information – security codes, gate codes, vacation dates.	To allow access when work is authorised.	Digital & Printed on Job Sheets	Destroy Date

Precautions:

1. GDPR Statement on the website & email footer.
2. Training given to Managers and Employees regarding data protection.
3. Customer Invoices provide opportunity to be 'forgotten'.
4. Customer Satisfaction Questionnaire provides opportunity to be forgotten or to be contacted by the business in the future.

Employee Personal Data

Data Held	Purpose	Format	Security
Name, address, phone, email	Correspondence.	Digital – Payroll software, spreadsheets, documents	Digital - Firewall & Anti-Virus Software. Computers are password protected
		Hard Copy Personnel Files	Hard Copy - Secured Filing Cabinet Archive & Destroy Dates
Financial Details / NI Number / Terms of Employment	Payroll, Tax & Employment	Digital – Payroll software, spreadsheets, documents	Digital - Firewall & Anti-Virus Software. Computers are password protected
		Hard Copy Personnel Files	Hard Copy - Secured Filing Cabinet Archive & Destroy Dates
Education & Certification	Employment & Third Party Compliance	Hard Copies Scanned Copies*	Secured Filing Cabinet Firewall & Anti-Virus Software. Computers are password protected

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Precautions:

1. Third Party Service Providers are checked and have adequate GDPR compliant procedures in place.
2. Certification with personal data is not passed to outside agencies unless employee consent has been given, the data is necessary, the agency can demonstrate compliance with GDPR and the records will be destroyed once they are no longer used.

Employee Personal Data – Special Category

Data Held	Purpose	Format	Security
Occupational health information	Compliance with H&S Legislation, Monitoring employee health.	Hard Copy – Questionnaires & Declarations. Medical Notes Scanned Copies Digital Register of OHS	Secured Filing Cabinet with specified access. System Firewall. Computers are password protected Archive & Destroy Dates
Criminal Records (DBS)	Required for authorised entry on specific sites.	Hardcopy	Secured Filing Cabinet with specified access. Archive & Destroy Dates
Accident Reports	Compliance with H&S Legislation.	Hard Copy Reports	Secured Filing Cabinet with specified access. Archive & Destroy Dates

Precautions:

1. Third Party Service Providers are checked and have adequate GDPR compliant procedures in place.
2. Certification with personal data is not passed to outside agencies unless employee consent has been given, the data is necessary, the agency can demonstrate compliance with GDPR and the records will be destroyed once they are no longer used.

Consent Statements:

Data Protection: We only use your personal information for the purposes of completing our work for you. Our IT systems are secure, and we will not share your details with anyone without your permission. We will share your details with the statutory bodies e.g. planning authority, if we need to make an application for permission or consult with them on your behalf. Please refer to our data protection policy on our website for full details.

Quote / Invoice - Hooper Services Ltd holds your name, contact details and job information on file securely for the purposes of contacting you and conducting our business. If you wish for your details to be removed at the end of our contract or contact with you please email hooperservices@btinternet.com or call our office.

Customer Satisfaction Questionnaire: Hooper Services Ltd holds your name, contact details and works information on our database securely and only for the purposes of contacting you and conducting our business. We will retain your data on our database unless you indicate otherwise.

1. *Please indicate if you are happy for us to contact you in the future with reminders or offers YES / NO (delete as appropriate).*
2. *Please indicate if you wish for us to remove your data from our database YES / NO (delete as appropriate).*