

1st Class Electrical Data Protection Policy

Policy Statement

As a business, 1st Class Electrical (Poole) Ltd is committed to uphold and maintain the key principles of the General Data Protection Regulations and data protection overall.

We hold to the requirement to ensure that personal data is dealt with lawfully, fairly and transparently.

1st Class Electrical (Poole) Ltd will operate in compliance with Article 5 of the GDPR and ensure that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

1st Class Electrical (Poole) Ltd is registered as a Data Controller with the Information Commissioners Office.

Implementation

As a business our commitment extends to the practical implementation of the requirements of the GDPR. This means that we will:

- review the purposes of our processing activities and select the most appropriate lawful basis (or bases) for each activity
- check that the processing is necessary for the relevant purpose, and are satisfied that there is no other reasonable way to achieve that purpose
- ensure that if consent is required for the personal data held, then this is obtained from individuals with a positive opt-in and will be clear and concise
- ensure that all individuals have the right to withdraw their permission for data to be held
- document our decision on which lawful basis applies to help us demonstrate compliance
- include information about both the purposes of the processing and the lawful basis for the processing in our privacy notice
- if we process special category data, then identify a condition for processing special category data, and have documented this
- if we process criminal offence data, we will also identify a condition for processing this data and document this
- delete any personal data for which there is no lawful basis to retain

Individual Rights

In all circumstances we will make certain that the rights of individuals are maintained. This will specifically ensure that individuals have:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

Individuals have the right to be informed about the collection and use of their personal data. We will provide individuals with information including: the purposes for processing their personal data, our retention periods for that personal data, and who it will be shared with.

Employees

1st Class Electrical (Poole) Ltd will only hold the personal data for employees that is required by the contract of employment and those details required to ensure legal compliance.

Employees will be made aware of the reasons why such data is held and what will happen to this personal data. They will be made aware that they can seek to request alteration of such data if they believe it is incorrect.

All employees will have the right to request information on what personal data is held on them. This will constitute a Subject Access Request.

Personal data will not be retained beyond the period of time for which it is required.

1st Class Electrical (Poole) Ltd will ensure that all staff are aware of the need to support data protection legislation and will promote a positive culture of data protection compliance across the business.

Prospective Customers

1st Class Electrical (Poole) Ltd will seek to uphold the principles of data protection when undertaking activity as regard prospective customers.

We may contact prospective customers by the following methods:

- Email
- Telephone
- Social Media channels
- Other digital approaches

Good practice principles will be adopted for all such methods.

If we use data lists relating to potential customers, we will ensure that those on the list have provided informed consent for the use of their personal data. If external lists are used then we will ensure that such data has been obtained from reputable sources, who are registered with the Information Commissioner's Office and operate within the terms of the Data Protection Act.

1st Class Electrical (Poole) Ltd will only send marketing material that relates to business matters. Our emails will contain a mechanism whereby the person can opt out of receiving any further e-marketing communications from us.

For any marketing activity, we will seek an informed and granular opt-in from individuals.

Personal data on potential customers is held and processed on the lawful basis of Legitimate Interest.

1st Class Electrical (Poole) Ltd will delete the personal data of prospective customers, as soon as it is no longer required.

Customers

1st Class Electrical (Poole) Ltd may hold a variety of personal data on customers. When a customer contacts us, we may collect their personal information such as name, address and email address. When customers browse our website, we may automatically receive their computer's internet protocol (IP) address.

Such data may be held in either electronic or physical format and in either case will be held securely and we will seek to ensure that any possible data breach is minimised.

Personal data will only be held if there is an identified lawful basis for storing and processing, it will not be retained beyond the period of time for which it is required.

Only with customer permission, will we send emails about our new products, services and other updates.

If we ask for customer personal data for a secondary reason, such as additional marketing, we will ask directly for expressed consent and provide an opportunity to say no. If after a customer opts-in, if they change their mind, they may withdraw their consent for us to contact them, for the continued collection, use or disclosure of your information, at any-time, by contacting us by email or mail.

We will not pass customer data to third parties for the use of marketing purposes, without a specific permission from the customer prior to doing so.

All customers will have the right to request information on what personal data is held on them. This will constitute a Subject Access Request.

Customers will be made aware of their right to withdraw their consent to 1st Class Electrical (Poole) Ltd holding their personal data. They will also be made aware that they may request the deletion of any personal data held.

Customers will be made aware that they can raise a complaint regarding the gathering or use of personal data, with either 1st Class Electrical (Poole) Ltd or the Information Commissioners Office.

A full Privacy Policy will be maintained that will provide full details on the gathering and use of personal data.

CCTV

1st Class Electrical (Poole) Ltd operate a CCTV system purely around and inside its office environment purely for the purposes of security.

Staff will be informed that they may be recorded as part of this system.

Any CCTV images obtained as part of operational security measures will be deleted as soon as possible and an automatic delete system will be utilised.

1st Class Electrical (Poole) Ltd may support customers in operating their CCTV systems, but we will not retain images, or any other personal data obtained from such systems.

Security

To protect personal data, we will take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed.

The methods that we will use, will ensure:

- that where information is stored on a computer, there is appropriate password protection and encryption in place
- that where information is stored in 'cloud' services, then password protection is in place
- that where hard copies of personal data are held in filing cabinets, then these will be located in a secure position and will be locked
- once personal data is no longer required for any lawful basis it will be deleted. This will cover both hard and electronic copies of such data

Third Parties

Where it is necessary to transfer personal data to relevant third parties, this will be considered carefully before any such transfer takes place.

1st Class Electrical (Poole) Ltd anticipates that the requirements for third parties will cover:

- Outsourced services relating to the processing of employee personal data including pension and health services
- Services relating to customers which will include processing personal data and payment details
- Services provided by third parties to undertake the services that constitute the service provision from 1st Class Electrical (Poole) Ltd, such as electrical installation and completion certificates

Where third parties are involved, 1st Class Electrical (Poole) Ltd will ensure that they are committed to the key principles of data protection and will seek to establish this on a contractual basis, where possible. This will also be the case when data is transferred internationally and outside of the European Economic Area.

1st Class Electrical (Poole) Ltd will seek to ensure that any personal data transferred to a third party, is deleted as soon as it is no longer required.

Data Control Officers

1st Class Electrical (Poole) Ltd will ensure that there is an appropriate named individual in place, who is responsible for the control and processing of relevant personal data.

Data Protection Impact Assessments (DPIA)

1st Class Electrical (Poole) Ltd will undertake a data protection impact assessment (DPIA) if we believe it is required. DPIA is a process to help identify and minimise the data protection risks of a project.

We understand that a DPIA is required for certain listed types of processing, or any other processing that is likely to result in a high risk to individuals' interests.

If a DPIA is required, it will:

- describe the nature, scope, context and purposes of the processing
- assess necessity, proportionality and compliance measures
- identify and assess risks to individuals
- identify any additional measures to mitigate those risks

To assess the level of risk, 1st Class Electrical (Poole) Ltd will consider both the likelihood and the severity of any impact on individuals. High risk could result from either a high probability of some harm, or a lower possibility of serious harm.

Data Breach

1st Class Electrical (Poole) Ltd will ensure that they monitor the use and processing of data and will seek to identify any data breach as soon as is practicably possible.

Any such data breach will be reported as appropriate.

Authorised Signatory

Name:

Signature:

Date: