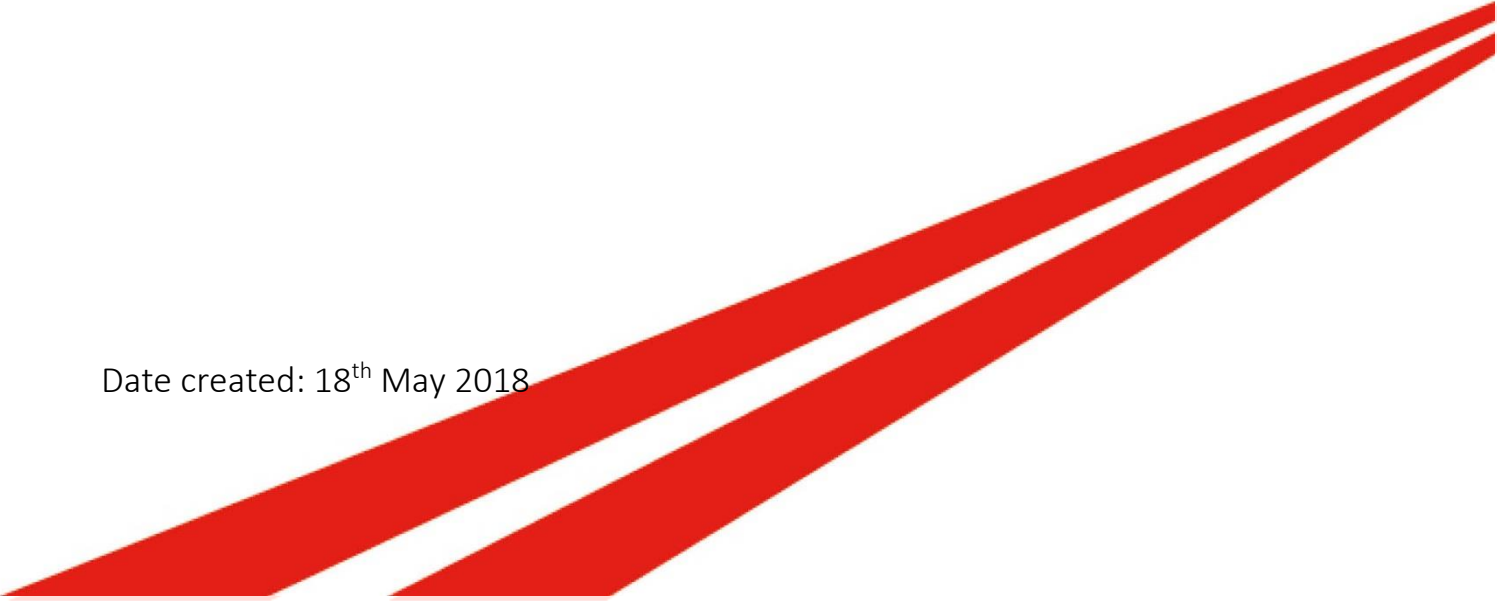




Wheel Solutions Group Limited  
General Data Protection Regulation Policy

Date created: 18<sup>th</sup> May 2018

A decorative graphic consisting of two parallel red diagonal lines that originate from the bottom left and extend towards the top right, crossing the bottom edge of the page.

## Approvals

The signatures below certify that this procedure has been reviewed and accepted and demonstrated that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared By	Ria Whiston		HR Assistant	18/05/2018
Reviewed By	Kerry Hibbert		HR & Payroll Officer	25/05/2018
Approved By	KH, CCH, JGB, MAW, SCM		SMT	

## Amendment Record

This procedure is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date

## Contents

Introduction .....	4
We are committed to:.....	4
What data we keep about you.....	5
How data will be used and kept.....	5
How long data is kept .....	6
Sharing your data with 3 <sup>rd</sup> party .....	6
Your rights.....	6
Disciplinary Consequences.....	7
Data Breach.....	7

## Introduction

From 25 May 2018, existing data protection duties will be tightened up under the EU General Data Protection Regulation (GDPR). The UK government has committed to implementing the GDPR irrespective of Brexit and has a new Data Protection Bill currently progressing through Parliament.

This will amend the existing DPA in line with the new rules, as well as introducing a few additional changes. This statement explains how WSL handles and uses personal data we collect about staff.

We are committed to protecting your personal information and to being transparent about what information we hold. WSL understands its obligations to you to help you understand how and why we process your personal data. This notice tells you about these uses.

## We are committed to:

- ensuring that we comply with the eight data protection principles
- meeting our legal obligations as laid down by the Data Protection Act 1998
- processing your data lawfully, fairly and in a transparent way
- only collecting your data for specified, explicit and legitimate purposes only
- keeping personal data up to date and accurate
- only keeping necessary data in relation to the purposes for which they are processed
- complying with an individual's right to be forgotten
- ensuring that data subjects' rights can be appropriately exercised
- to give individuals access to their personal data when requested, within 1 month
- providing adequate security measures to protect personal data
- ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- ensuring that all staff are made aware of good practice in data protection
- providing adequate training for all staff responsible for personal data
- to complete an annual data protection audit to ensure compliance with new regulation
- ensuring that everyone handling personal data knows where to find further guidance
- ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
- regularly reviewing data protection procedures and guidelines within the organisation
- informing individuals of all 3<sup>rd</sup> party's which your data is shared with and why
- inform all individuals of who and how to access further information regarding their data and how to make a complaint regarding security breaches
- giving instruction and access to amending/updating personal data by the individual when required

## Why we hold your personal data

We are required to hold your personal data for various legal and practical purposes, without which we would be unable to employ you. Holding your personal data enables us to meet various administrative and legal obligations (eg for tax purposes). We will also process your personal information in other circumstances, provided you have given your consent for us to do so.

## What data we keep about you

The information we hold about you is primarily information you provided when applying for your job, supplemented by information generated during your employment.

- Name
- Address
- Date of birth
- Sex
- Work experience
- Any references
- National Insurance Number
- Tax Code
- Details of any known disability
- Emergency contact details
- Employment history with the organisation
- Medical history / details
- Employment terms & conditions (e.g. pay, hours of work, holidays, benefits, absence)
- Any accidents connected with work
- Any training taken
- Any disciplinary action
- Biometric data
- Photographs of you
- information related to the prevention and detection of crime and the safety of staff including, but not limited to, CCTV recording;
- your visa requirements; copies of passports, visas, and other documents required to ensure compliance with Home Office requirements.
- Details of your education, qualifications and publications.

## How data will be used and kept

- Personal data shall be processed fairly and lawfully and shall be obtained for one or more specified and lawful purposes and shall not be further used in any manner incompatible with that purpose or those purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date. It is the employee's duty to ensure that any change in personal data must notify HR to keep personnel files accurate and log any changes with HMRC.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal Data which is no longer required is disposed of appropriately i.e. shredded or deleted.
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998.
- Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

## How long data is kept

We will keep your personal data only if is necessary for the purpose(s) for which it was collected. Data will be securely destroyed when no longer required. Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, dates of employment, date of birth and any H&S records including training documents) to ensure we do not contact you inadvertently in future, and to maintain your record for archive purposes. We may also need to retain some financial records about you for statutory purposes (e.g. accounting matters).

## Sharing your data with 3<sup>rd</sup> party

WSL will share your personal data where it's necessary to provide you with the services you want, for example your data will be shared with:

- Relevant data will be shared with Pensions providers
- Relevant data will be shared with the HMRC for payroll purposes and may be shared with our accountants (for audit purposes).
- Relevant data may be shared with your next of kin but only with your consent or in an emergency.
- Relevant data may be shared with Home Office, UK Visas and Immigration (UKVI) to fulfil WSL's legal obligations as an employer
- Data may be shared with reputable "data processors" for the purposes of sending communications (e.g. mail chimp).
- With your permission we may share information about you for publicity and marketing purposes online, in print and on social media.

Otherwise, the WSL Group does not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them

## Your rights

You have the following rights

To be informed	This privacy Notice provides the information you are entitled to receive
Access	<p>Please contact us if you would like confirmation that your data is being processed and access to your personal data.</p> <p>There is no charge for us providing you with this data and it will usually be provided within a month of the request (unless the request is unfounded or excessive)</p>
Rectification	<p>Please inform us of any data which you would like rectified and we will usually respond within a month of request.</p> <p>We will pass in the changes to any third parties who need to change their records and let you know this has been done</p>

Erasure	You may exercise the your right to have your personal data erased in a number of circumstances (e.g. if the data is no longer necessary in relation to the purpose for which it was created or you withdraw your consent). Where possible we will comply with all such requests, apart from the reasons detailed above under 'How long data is kept'.
Restrict Processing	You can tell us that we can keep your data but must stop processing it, including preventing future mailings and communications.  If possible, we will inform any third parties to whom your data has been disclosed of your requirement.
Data Portability	Your data is across manual records and a database. We will do our best to provide information in a portable format, but it is unlikely that we can create systems to do so
To object	If we can, we will stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling).  We will stop processing your data for direct marketing if you tell us to.  We will stop processing your data if you object to processing for purposes of research & statistics
Not to be subject to automated decision-making including profiling	We do not use any automated decision-making.

## Disciplinary Consequences

Unlawfully obtaining or disclosure of personal data or any other breach of the data protection act 1998 by staff will be treated seriously by WSL Ltd and disciplinary action may be taken.

## Data Breach

In the unlikely event that you feel your data is being used unlawfully please contact our Privacy Representative Kerry Hibbert on 01543 870182. If you would like further information, contact the **Information Commissioners Office** Helpline on 0303 123 1113 or [www.ico.org.uk](http://www.ico.org.uk)

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, WSL will notify ICO and the individual/s ASAP.

### **Information Commissioners Office**

Helpline: 0303 123 1113

[www.ico.org.uk](http://www.ico.org.uk)

### **Data Protection Network**

(DPN) [www.dpnetwork.org.uk](http://www.dpnetwork.org.uk)