

GENERAL DATA PROTECTION

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1 Privacy Notice :

1.1 Statement :

- A.C.Bacon Engineering Ltd is committed to meeting its obligations under the General Data Protection Regulation* which comes into force on 25th May 2018, and will strive to observe the law in all collection and processing of subject data, by design and by default.
- * will continue to apply when UK leaves the EU (Under the new UK Data Protection Bill).

- A.C.Bacon Engineering Ltd will :
 - Meet any Subject access request in compliance with the law.
 - Only use data for legitimate purposes and functions in a way that is not prejudicial to the interests of Individuals.
 - Take due care in the collection and storage of any sensitive data.
 - Do their utmost to keep all data accurate, up-to-date and secure.

- A.C.Bacon Engineering Ltd will not :
 - Use any personal data for the purposes of marketing or profiling without the express permission of the subject.
 - Share any personal data except for legitimate reasons and only with those 3rd Parties whom are also GDPR compliant. In such cases, the Subject shall be informed of the reasons for sharing, together with the risks, rules, safeguards and rights of the Subject, unless impossible or of disproportionate effort, as laid down by law.

1.2 A.C.Bacon Engineering Ltd Website :

- We may collect technical data about the type of Internet browser and computer operating system that you use.
- This information does not identify you as an Individual and is used only for tracking of site use.
- "Cookies" may also appear on your hard drive that will help us to identify you when you return to the site and allow us to tailor content to your personal preferences.

2 Subject Rights :

2.1 An Individual has the right to :

- Be informed
- Request simple / easy access to personal data
- Rectify personal data
- Restrict processing
- Portability of personal data
- Object to the processing of personal data
- Erase personal data
- Not to be subject to automated decision making including profiling (N/A to A.C.Bacon)
- Withdraw consent to the processing of personal data
- Complain about the processing of personal data

2.1.1 Right to be Informed :

- Put simply : *“I`d like to understand what you use my data for and how it is handled”*

2.1.2 Right to Access :

- *“I`d like to request access to my personal data, so I can understand what you use it for”*
- The Subject shall firstly be formally identified.
- Will typically be free of charge to the subject.
- Must be complied with / actioned within 1 month.
- May be refused or charged for if manifestly unfounded or excessive, but the right to complain to the supervisory authority and/or seek judicial remedy must be explained to the subject within 1 month.

2.1.3 Right to Rectify :

- *“I`d like to formally request that my information is corrected, as it`s inaccurate or incomplete”*
- Will typically be free of charge to the subject

- Must be complied with / actioned within 1 month
- May be refused or charged for if manifestly unfounded or excessive

2.1.4 Right to Restrict Processing :

- *"I'd like you to stop processing my information in that way"*
- If A.C.Bacon find that there`s no legitimate reason to hold and/or process the information, we will uphold the right to restrict processing.
- Must be complied with / actioned within 1 month

2.1.5 The Right to Data Portability :

- *"I'd like to share my data with a 3rd Party".*
- Personal data an individual has provided to the Controller.
- Where the processing is based on the individual`s consent for the performance of n contract.
- When processing is carried out by automated means.
- Must be complied with / actioned within 1 month.

2.1.6 Portability :

- How transferred
- Within 1 month of request
- In a commonly used format
- From Controller to Controller

2.1.7 The Right to Object :

- *"I'd like you to stop processing my information in that way"*
- Personal data an individual has provided to the Controller
- Must be complied with / actioned within 1 month if there is no legitimate reason to process this information / in this way.

2.1.8 The Right to Erasure :

- *"I'd like you to delete my personal information as you don't have a legitimate reason to hold it"*
- Must be complied with / actioned within 1 month if there is no legitimate reason to hold this information.
- The Subject has increased rights when `consent` is the only lawful basis.
- The Subject has the right to request removal of records if the purpose of the data is no longer necessary in relation to the reasons for which it was collected, if originally collected for legitimate purposes.
- The Controller must ensure any Subject request for deletion of personal data is also erased from the records of anyone this information has been shared with.
- Electronic copies shall be deleted from all main storage and any copy / archive records. Hard copies shall be shredded or equivalent.

2.1.9 Enquiries / Complaints :

- Please contact our Data Protection Officer if you have any queries, requests or complaints regarding data protection or similar.
- If satisfactory resolve is not met, the Subject has the right to lodge complaint with the Information Commissioners Office (ICO)

3 Data Processing :

3.1 Lawful basis of processing :

- Legitimate (incl Business) interest and/or for the prevention of fraud and/or marketing purposes.
OR
- Contractual – for specific purposes pertaining to a Contract or Project.
OR
- Consent from the Subject : Explicitly required for any `Special Category Data` such as information on Health, Ethnic Origin, Driving License* etc.

*Specific consent must be attained from the Subject via a form : `D906 – Fair Processing Declaration` for Driving License data to be held.

The validity of this form will expire after 3 years from the date of the driver's signature or when connection with the Company ceases.

3.1.1 Legitimate :

- Information and/or data given by the Subject but not required for legitimate (including business) reasons.

3.1.2 Contractual :

- Information and/or data given by the Subject but not required for legitimate (including business) reasons.
- Must be freely given by the Subject (incl verbally)

3.1.3 Consent :

- Information and/or data given by the Subject but not required for legitimate (including business) reasons.
- Must be freely given by the Subject (incl verbally)
- Must be specific
- Must be informed
- Must be unambiguous
- Must be separate from other Terms & Conditions
- Cannot be `assumed from silence` or pre-ticked boxes
- Must be given under the supervision and/or by a Parent or Guardian where the Subject is under 16 years of age (may ultimately be lowered to 13 in the UK)

3.1.4 Withdrawing Consent :

- *"I'd like you to delete any information given by my personal consent only"*
- If not required for legitimate (including business) reasons
- Must be actioned within 1 month of request
- Without detriment to the Subject

3.2 Register :

- A formal register will be held by the Data Controller and updated as necessary, keeping records of the date and method of consent for each item of information/data stored.

- This register shall include the following types of data, (not exhaustive) :
 - Employees
 - Ex Employee
 - Customers
 - Potential Customers
 - Suppliers
 - Temporary workers / sub-contractors
 - CCTV
 - E-mails
 - Mobile phones
 - Bank records
 - Spreadsheets
 - Paper Documents (archives)
 - Electronic Documents (archives)
 - Business Cards
 - Phones numbers
 - Addresses
 - Photographs
 - Personnel Files / contents
 - Training records
 - Qualifications
 - Pension
 - Payroll
 - Medical
 - Marketing
 - Future

4 Data Controller :

- Controls How / Why data is processed.
- Maintain Data Register.
- Keep up-to-date with Data Processing Laws and ensure all A.C.Bacon processes and procedures are updated according.
- Organise audits as necessary – Check, Collect, Correct.
- Determines access permission / rights.

5 Data Processor(s) :

- Processes Data under the guidance of the Data Controller.
- All personal data and information shall remain confidential.

6 Data Protection Officer :

6.1 Required if :

- A Public Authority (N/A to A.C.Bacon)
- Carrying out regular or systematic monitoring of individuals on a large scale (N/A to A.C.Bacon)
- Carry out large scale processing of special categories such as Health Records, Criminal convictions etc

7 Security :

- A.C.Bacon Engineering Ltd employs technical and organizational security measures to protect personal data from any deliberate or other manipulation, loss, destruction or access by unauthorized persons.
- Our security measures are improved and adapted on a regular basis according with security software developments and improvements.

7.1.1 Breach protocol

- Report any security breaches to ACB Data Protection Officer in the first instance, as soon as any breach becomes known.
- ACB to advise Subject of any significant data breach within 72 hours.
- ACB DPO also to advise ICO.
- Detection
- CPO to coordinate an internal investigation into the data breach.
- CPO to write up formal report of findings and advise Subject as applicable.

8 Records :

8.1 Retention periods

- Personal data / information records shall be held for as long as they have legitimate reason for doing so

8.2 Archiving

- Archiving may be hard copies and/or hard electronic, securely stored under lock and key or password protected, as applicable.

8.3 Obsolete records

- Shall be destroyed as in clause 2.1.8 above.