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Introduction

The EU General Data Protection Regulation 2016/679 took effect 25-5-18 and will not be repealed by Brexit. It places direct obligations on data processors and controllers, and there will be a significant increase in penalties of 40% annual worldwide turnover or €2Million whichever is biggest. Changes will include; Rights of data subjects to be forgotten, Higher standard of consents and organisations will need policies and systems for data breaches, framework of accountability, privacy principles and sharing of data. The EU Regulation on privacy and electronic communications was May 2018 will reference use of cookies, Wi-Fi tracking, electronic direct marketing and electronic content meta data.

Privacy Principle

Data provided by clients, associates, suppliers and affiliated organisations shall be respected and protected in accordance with the EU General Data Protection Regulation 2016/679.

Data Protection Policy

SEL Group Ltd will comply with the requirements of the EU General Data Protection Regulation and have stated this intent in the quality and data protection policy 2018.

Data Protection Officer

Data protection shall be assured by A McEntire

Data risk assessment

Data shall be identified and assessed regarding its sensitivity using the assessment tool below and this shall be reviewed annually at the management review.

Right to be forgotten

Data shall be removed from any database at the request of the data subject.

Breaches in data security

Any breaches in data protection shall be reviewed, mitigated and corrected in accordance with the SEL Group Ltd nonconformance process and any parties affected shall be advised within 10 days of the discovery of the breach.

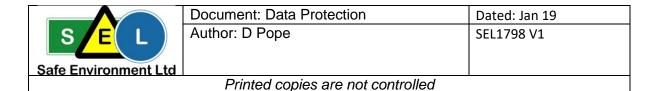
Data Sharing

All persons working with or on behalf of SEL Group Ltd shall not share any personal or sensitive data unless they have the permission of A McEntire.

Data sharing with parties as a legal obligation such as driving licence details shall be conducted by a McEntire who shall instruct the vehicle hire company to delete the data immediately after use.

Data sharing as part of a contractual agreement (auditee details for IEMA/IRCA etc) or attendee details to IOSH shall be provided to meet these contractual obligations and no further details shall be provided. Electronic files will be in the format provided by the affiliate organisation or as a protected adobe document.

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Data protection

Electronic data

No personal or sensitive data shall be uploaded onto any system without the prior consent of the data subject.

The IT files are password protected to prevent access and computers shall be turned off when not in use to prevent unauthorised access.

All SEL Group Ltd computers are protected by McAfee software

Only SEL Group Ltd Approved Passport or data stick devices shall be used with SEL Group equipment.

Documentation

No paper copies of the client reports are retained by the office, as only an electronic copy is retained for a period of up to 10 years to be used in the event of future queries.

Documentation provided to support a report (audit checklists, site plans, analysis records etc) shall be retained in the office for a period of three years after the report has been issued, after which the documents will be recycled. These documents are filed and no accessible to unauthorised persons.

SEL Group documentation containing sensitive or personal data shall be shredded prior to paper recycling.

Standard of consent

For any electronic marketing data subjects shall be provided with a means to easily remove their consent from the marketing strategy.

Training and awareness

Staff shall be advised of this data protection procedure as part of the induction process and annual contract review.

Contacting clients, staff, associates or other interested parties

No person shall be contacted by email or sent a newsletter for purposes other than contractual communication unless they have provided their consent for this contact. Such permission shall be provided in writing as part of the feedback sheet SEL 1253 v3.

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	Document: Data Protection	Dated: Jan 19		
	Author: D Pope	SEL1798 V1		
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EU General Data Protection Regulation 2016/679 & draft EU Regulation on privacy and electronic communications

Sources of	Sensitivity of	Sharing/upload	Protection of	Status	Removal of		
data	data	of data	data		data		
Clients order	Accounts	None	Password	Controlled	Removed		
details as	details		protected file.		from working		
specified on	Moderate		Never on		computer		
contract			cloud		after 3 years		
Client contact	Name & work	None	Password	Controlled	Reports		
details on	address Low		protected file.		removed		
reports			Never on		from working		
			cloud		computer		
					after 3 years		
IOSH course	Contact details	IOSH only	Password	Controlled	12 months		
data	Moderate		protected file.		from		
			Never on		certificate		
			cloud				
Suppliers	Bank details	None	Password	Controlled	Removed		
invoice data	high		protected file.		from working		
			Never on		computer		
			cloud		after 3 years		
Course	Contact details	None	Password	Controlled	Removed		
attendees	Moderate		protected file.		from working		
			Never on		computer		
A: - t	Camba at alataila	Nama	cloud	Cambuallad	after 3 years		
Associates	Contact details	None	Password	Controlled	Removed		
	&		protected file.		from working		
	qualifications Moderate		Never on cloud		computer		
Drivers	Name NI	Vehicle hire	Password	Controlled	after 3 years Deleted by		
Dilveis	number, driver		protected file.	Controlled	hire company		
	details high	company as adobe file	Never on		Time company		
	uctalis High	adobe file	cloud				
Dropbox	DP	Shared with	ciouu	Not	Add request		
Бторвох	Qualification	clients only		controlled	to clients not		
	data & SEL	cherres orny		controlled	to share data		
	Group Data				to share data		
	Moderate						
	Draft EU Regulation on privacy and electronic communications						
Cookies							
Wi-Fi Tracking							
Direct							
marketing							
Metadata							

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SEL	Author: D Pope	SEL1798 V1			
Safe Environment Ltd					
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Newsletter	Not sent unless authorised by	Signature on form SEL1253	Controlled	
	client	& GDPR		
		newsletter list		

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