 <b>Safe Environment Ltd</b>	Document: Data Protection	Dated: Jan 19
	Author: D Pope	SEL1798 V1
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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The EU General Data Protection Regulation 2016/679 took effect 25-5-18 and will not be repealed by Brexit.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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**EU General Data Protection Regulation 2016/679 & draft EU Regulation on privacy and electronic communications**

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

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Newsletter		Not sent unless authorised by client	Signature on form SEL1253 & GDPR newsletter list	Controlled	
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