Corpor@te Facilities Services Ltd

GDPR Policy

Corporate Facilities Services Limited processes personal data in relation to its employees, workers, contactors, and individual client contacts. It is vitally important that we abide by the principles of the Data Protection Act 1998 set out below.

Corporate Facilities Services Limited holds data on individuals for the following general purposes:

- Staff Administration
- Accounts and records
- Advertising, marketing, and public relations

The Data Protection Act 1998 requires Corporate Facilities Services Limited as data controller to process data in accordance with the principles of data protection. These require that data shall be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant, and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with the data subjects' rights
- Kept securely
- Not transferred to countries outside the European Economic Area without adequate protection

Personal data means data, which relates to a living individual who can be identified from the data or from the data together with other information, which is in the possession of, or is likely to come into possession of, Corporate Facilities Services Limited.

Processing means obtaining, recording, or holding the data or carrying out any operation or set of operations on the data. It includes organising, adapting, and amending the data, retrieval, consultation and use of the data, disclosing and erasure or destruction of the data. It is difficult to envisage any activity involving data, which does not amount to processing. It applies to any processing that is carried out on computer including any type of computer however described, main frame, desktop, laptop, tablet etc.

Data should be reviewed on a regular basis to ensure that it is accurate, relevant, and up to date and those people listed in the appendix shall be responsible for doing this.

Data may only be processed with the consent of the person whose data is held. Therefore, if they have not consented to their personal details being passed to a third party this may constitute a breach of the Data Protection Act 1998.

By accepting employment with Corporate Facilities Services Limited and providing us with personal data contained in an application form, CV etc. employees will be giving their consent to processing their details for work purposes. If we intend to use employee personal data for any other purpose, we will request their consent in writing.

However, caution should be exercised before forwarding personal details of any of the individuals on which data is held to any third party such as past, current, or prospective employers; suppliers; customers and clients; persons making an enquiry or complaint and any other third party.

GDPR Policy

Data in respect of the following is "sensitive personal data" and any information held on any of these matters MUST not be passed on to any third party without the express written consent of the individual, unless required by law:

- Any offence committed or alleged to be committed by them
- Proceedings in relation to any offence and any sentence passed
- Physical or mental health or condition
- Racial or ethnic origins
- Sexual life
- Political opinions
- Religious beliefs or beliefs of a similar nature
- Whether someone is a member of a trade union

From a security point of view, only the HR department staff should be permitted to add, amend, or delete data from the database. However, all staff are responsible for notifying those listed where information is known to be old, inaccurate, or out of date. In addition, all employees should ensure that adequate security measures are in place. For example:

- Computer screens should not be left open by individuals who have access to personal data
- Passwords should not be disclosed
- Email should be used with care
- Personnel files and other personal data should be stored in a place in which any unauthorised attempts to access them will be noticed. They should not be removed from their usual place of storage without good reason
- Personnel files should always be locked away when not in use and when in use should not be left unattended
- Any breaches of security should be treated as a disciplinary issue
- Care should be taken when sending personal data in internal or external mail
- Destroying or disposing of personal data counts as processing. Therefore, care should be taken in the disposal of any personal data to ensure that it is appropriate. For example, it would have been more appropriate to shred sensitive data than merely to dispose of it in the dustbin

It should be remembered that the incorrect processing of personal data e.g. sending an individual's details to the wrong person; allowing unauthorised persons access to personal data; or sending information out for purposes for which the individual did not give their consent, may give rise to a breach of contract and/or negligence leading to a claim against Corporate Facilities Services Limited for damages from an employee or client contact. A failure to observe the contents of this policy will be treated as a disciplinary offence.

Data subjects, i.e. those on whom personal data is held, are entitled to obtain access to their data on request but may be subject to payment of a fee. All requests to access data by data subjects i.e. employees, , customers or clients, suppliers, students etc should be referred to the Data controller at the Company head office address.

Finally, it should be remembered that all individuals have the following rights under the Human Rights Act 1998 and in dealing with personal data these should be always respected:

- Right to respect for private and family life
- Freedom of thought, conscience, and religion
- Freedom of expression
- Freedom of assembly and association
- Freedom from discrimination