



International Gas Detectors Ltd

General Data Protection

Policy Updated 1 January 2019, next review January 2021

Introduction

1. The Company is a “data controller”. This means that the Company is responsible for deciding how it holds and uses personal information about the employees. The Company is required, under data protection legislation, to notify the employees of the information contained in the Privacy Notice.
2. The Company processes relevant personnel data regarding employees as part of its operation and shall take all reasonable steps to do so in accordance with this notice.
3. Processing includes, but is not limited to, collection, recording, organising, structuring, storing, adapting or altering, retrieving, consulting, disclosing by transmission, disseminating or otherwise making available, aligning or combining, restricting, erasing or destroying and general use of personal data. The Company will endeavour to ensure that all personal data is processed in compliance with this notice and the principles of the General Data Protection Regulation (GDPR).
4. The person responsible for data protection in the Company is your line manager in the first instance. The Company may be required to appoint a Data Protection Officer (DPO), further details can be found in the Privacy Notice.
5. The DPO/responsible person will endeavour to ensure that all personal data is processed in compliance with this notice and the principles of the GDPR.

The Principles

1. The Company is required to comply with the Data Protection principles (“Principles”) contained in the GDPR to ensure all data is: -
 1. used lawfully, fairly and in a transparent manner
 2. collected for valid purposes that the Company has clearly explained to the employee and not used in any way that is incompatible with those purposes
 3. adequate, relevant and limited to what is necessary for the purposes that the Company has told the employee.
 4. accurate and kept up to date
 5. kept for as long is necessary for the purposes that the Company has told the employee about.
 6. processed in a manner that ensures appropriate security

Personal & Sensitive Personal Data

1. The processing of both personal data and sensitive personal data is subject to the above mentioned six data protection principles.



International Gas Detectors Ltd

2. Personal Data covers any information relating to a living person, that can be identified directly or indirectly, by a unique identifier such as name, ID number, location data or online identifier i.e. IP addresses.
3. Sensitive Personal Data can include a person's racial/ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation.

Right to be Informed

1. Employees have the right to be informed about how the Company uses their data.
2. The GDPR sets out the information which should be supplied to employees and when they should be informed. In all circumstances, the following information should be supplied:
 1. Name and contact details of the Company and the DPO (if applicable)
 2. Purpose and the lawful basis for the processing
 3. The legitimate interests of the controller or third party, where applicable
 4. Any recipient or categories of recipients of the personal data
 5. Details of transfers to any country outside of the European Economic Area (EEA) and safeguards
 6. Retention period or criteria used to determine the retention period
 7. The existence of each of the employee's rights
 8. The right to withdraw consent at any time, where relevant
 9. The right to lodge a complaint with a supervisory authority
 10. The existence of automated decision making, including profiling and information, if applicable, about how decisions are made, the significance and the consequences
3. In circumstances where the data has been obtained directly from the employee, additional information should be supplied. The employee should be informed whether the provision of personal data is part of a statutory or contractual requirement/obligation. The employee should also be informed of any possible consequences of them failing to provide the personal data.
4. In circumstances where the data has not been obtained directly from the employee i.e.- through a third party, the following additional information should be supplied:
 1. Categories of personal data
 2. The source the personal data originates from and whether it came from publically accessible sources
5. The information above can be found in the Company's Privacy Notice.

Right of Access

1. Employees have a right of access to personal data held by the Company relating to themselves. Any individual wishing to access their personal data should put their request in writing to your line manager. The Company will endeavour to respond to any such written request as soon as is reasonably practicable and in any event within one month of receipt.
2. The Company is able to extend the period of compliance by a further two months where requests are complex or numerous. In these circumstances, the Company will inform the



International Gas Detectors Ltd

employee within one month of the receipt of the request and explain why the extension is necessary.

3. The Company will normally provide a copy of the requested information free of charge. However, please note that the Company may charge a reasonable fee in certain circumstances e.g. where the request is excessive.
4. The employee should be aware that certain data may be exempt from the right of access.

Right to Rectification

1. All employees have the right to have their data rectified if it is inaccurate or incomplete. Employees must notify your line manager of any changes to information held about them.

Right to Erasure

1. Employees may have the right to have their personal data erased. The right is not absolute and only applies in certain circumstances. Further details can be found in the Privacy Notice.

Right to Restrict Processing

1. Employees may have the right to request that the processing of their personal data is restricted or suppressed. The right is not absolute and only applies in certain circumstances. Further details can be found in the Privacy Notice.

Right to Data Portability

1. Employees may have the right to obtain and reuse their personal data for their own purposes across different services. The right is not absolute and only applies in certain circumstances. Further details can be found in the Privacy Notice.

Right to Object

1. Employees may have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling) and processing for purposes of scientific/historical research and statistics. The right is not absolute and only applies in certain circumstances. Further details can be found in the Privacy Notice.
2. If the employee's data is used for direct marketing purposes, the employee has the right to object to this and should inform your line manager.

Rights in relation to automated decision making and profiling



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1. The Company is restricted from making solely automated decisions, including those based on profiling, that have a legal or similarly significant effect on employees. The right is not absolute and only applies in certain circumstances. Further details can be found in the Privacy Notice.

Security

1. All employees will be made aware of, and should ensure they comply with, this Notice and their duties under the GDPR. The Company will ensure, so far as reasonably practicable, that all personal information is held securely and is not accessible to unauthorised persons.
2. Further information on the Company's security can be found in the Privacy Notice.

Enforcement

1. If an individual believes the Company has not complied with this notice or acted otherwise than in accordance with the GDPR, they should utilise the Grievance Procedure and should also notify your line manager.

Further Information

1. For further information, can be found in the Company's Privacy Notice. Alternatively, please contact your line manager.



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