

1. Data Protection Policy

1.1. Importance of Data Protection

In order to operate as an organisation we hold Personal Data about employees, suppliers, customers, and other individuals. The use of personal data is governed by the General Data Protection Regulation (the "**GDPR**"). We take data protection very seriously and understand the impact that data breaches and misuse of data may have on data subjects as well as on our activities. Compliance with this policy is necessary for us to maintain the confidence and trust of those whose personal data we handle.

Non-compliance with this policy by employees could in certain circumstances constitute a serious disciplinary matter.

1.2. Who this Policy applies to

This policy applies to employees, consultants, temporary / agency staff, volunteers and anyone acting on behalf of Bemodern Ltd. In this policy, reference to "employee" includes reference to any consultants, temporary / agency staff, volunteers and anyone acting on behalf of Bemodern Ltd.

1.3. This Policy Statement

The aim of this policy statement is to give you a basic understanding of the data protection laws, our responsibility in respect of data protection practice, your rights and obligations and to explain why privacy is so important to us. It applies to all actions we take which involve the processing of and working with personal data. This policy has been approved by: John Harris a Director of Bemodern Limited

1.4. Data Protection Representative

Data Protection Representative is Mr David M Butler. Please feel free to contact him at any time if you have questions or concerns about the operation or interpretation of this policy. My contact details are as follows:

david.butler@bemodern.co.uk

1.5. What do I need to know about Data Protection?

1.5.1. Data protection legislation is not intended to prevent processing of personal data but to ensure it is done fairly and lawfully and in a way which does not adversely affect an individual.

1.5.2. We will process personal data in accordance with the data protection laws. Processing includes obtaining, recording, holding, reading, using or destroying personal data.

1.5.3. The GDPR regulates the processing of personal data. Personal data is information relating to an identified or identifiable natural person. An identifiable natural person is someone who can be identified, directly or indirectly, in particular by reference to an identifier, which include names, identification numbers, location data or other factors such as the physical, genetic, biometric, mental, economic or social identity of a natural person.

Data about businesses or organisations is not covered by the GDPR but data about their directors, partners, employees, customers and suppliers is.

- 1.5.4. We will process personal data in accordance with the GDPR and good data protection practice and will only use personal data for the purpose(s) it was intended for. We will keep a processing record of all processing of personal data we perform. We will make sure our fair processing notices are up to date and reflect the processing activities we undertake.
- 1.5.5. We will store personal data in a safe and secure manner and only people who really need to use it as part of their work responsibilities will have access to it. We will keep personal data only as long as is necessary for the purpose(s) it was collected for. Once personal data is no longer required, we will take reasonable steps to delete, destroy or erase it.
- 1.5.6. We will keep personal data up to date. Where a data subject reports an inaccuracy in the personal data we hold, we will correct it (unless we know the information is correct) and will inform any recipients of that personal data of the amendments.
- 1.5.7. We will avoid collecting special categories of personal data or criminal data unless absolutely necessary. If we do collect it, we will take extra measures to ensure it is kept safe and secure (see section **Error! Reference source not found.** below).
- 1.6. Keeping data secure
 - 1.6.1. We will process personal data securely by ensuring the confidentiality, integrity and availability of personal data is kept secure. We will ensure the level of security we use is appropriate to the risks arising out of the processing.
 - 1.6.2. We have put in place a variety of policies and procedures which will keep data secure by providing guidance for our staff and contractors as to how personal data should be stored in order to reduce, as far as reasonably possible, the risks involved in processing personal data.
 - 1.6.3. We will work together with our IT team to ensure that where our staff need to take electronic equipment containing personal data out of the office environment, the device contains security to keep the personal data safe and secure.
 - 1.6.4. We have put in place other organisational and physical security measures to protect personal data. Staff and contractors must take particular care if they process personal data whilst working from home or away from the office.
- 1.7. Requests for data
 - 1.7.1. Individuals are entitled to make a request to us for a copy of the personal data that we hold about them. Requests should describe the information sought. Where we receive requests for personal data we will answer the request without undue delay and normally within one calendar month of receipt. See Appendix 4: Subject Access Request Form

1.7.2. All data subject access requests will be considered with regards to the current GDPR rules. If applicants are unhappy with the way we handle requests, they should let us know By: Emailing: david.butler@bemodern.co.uk

1.7.3. Occasionally other bodies may ask for access to personal data we hold such as the police, the tax authorities and other enforcement agencies. Such requests should be referred to: david.butler@bemodern.co.uk

1.8. Other rights

1.8.1. Data subjects have a number of rights including a right to erasure, a right to data portability, a right to object to certain processing, a right to restrict processing in certain circumstances and a right to prevent automated decision making in certain circumstances, a data subject may request that the processing of their personal data be restricted. If you receive such requests, please refer it to: david.butler@bemodern.co.uk

1.8.2. We are committed to ensuring data subject rights are upheld and we will work hard to make sure these rights can be exercised.

1.9. Sharing Data with other people/organisations

We will not send personal data to a third party or another organisation unless the data subject has given us their authority to do so or we are otherwise permitted by law. We will take care to consider whether the data subject has given authority to their data being passed to another organisation before we transmit the data. Where data is being sent to an organisation for them to process the data either on their own behalf or for us, we will carry out due diligence on that organisation to make sure they have adequate data protection standards and processes. We will carry out due diligence, put in place contracts and/or data sharing protocols to govern the use of data by the third party to ensure compliance with all relevant legislation and guidance.

1.10. Staff, Customer, Supplier, Data

In the course of normal business operations we will collect and process various personal data about employees, suppliers, customer, including special category personal data. This information will be retained for the period set out in the data retention policy. We will process this data in accordance with the relevant fair processing notices.

1.11. Training

We will provide all staff and temporary workers with appropriate data protection training to make sure that data protection issues are dealt with properly and in accordance with this policy and the law. We will make sure staff, temporary workers and workers at our processors have adequate training for their roles.

1.12. Data Retention and Destruction

Personal data will be retained by us as long as we need to process it or for as long as the law requires us to keep it. When we no longer need data we will delete or destroy it in accordance with good data protection practice. Where we use third party contractors to delete or destroy data, we will only use contractors who can demonstrate relevant experience and accreditations.

1.13. Data breaches

A data breach is a breach of security which leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to, personal data transmitted, stored or otherwise processed. In the event of a data breach, the Data Protection Representative shall log the breach, deal with it and resolve any issues arising out of the breach.

1.14. Transferring Data Outside the EEA

We do not intend to transfer personal data outside the EEA. Where it is necessary to do so we will ensure any such transfer is carried out in accordance with the requirements of the GDPR to ensure that the level of protection to data subjects guaranteed by the GDPR is not undermined by any such transfer.

In the event that the United Kingdom leaves the European single market, we shall ensure that any transfer of personal data overseas is transferred in accordance with all applicable data protection legislation in place at the time of such transfer.

1.15. Changes to this Policy

We reserve the right to change this policy at any time where it is appropriate for us to do so; we will notify individuals of these changes.

In the event that the United Kingdom leaves the European single market, we will ensure that we comply with any new data protection legislation that is enacted as a result.