

# DATA PROTECTION POLICY

# QUALITY VENTILATION SYSTEMS (UK) LTD

108 Chaucer Road, Aylesbury, Bucks HP21 7LN  
Office: 01296 294871 | Email: [info@qvs-uk.com](mailto:info@qvs-uk.com) | Web: [www.qvs-uk.co.uk](http://www.qvs-uk.co.uk)

## Key Details:

This policy has been prepared by Sue Jones, Director of QVS (UK) Ltd

This policy to be operational from 25<sup>th</sup> May 2018

Next review date: 12<sup>th</sup> May 2019

## Data Protection Principals and why this policy exists for QVS:

- To comply with data protection law and follow good practice
- Protect the rights of staff, customers & suppliers
- To protect itself from the risks of a data breach
- Lawfulness, fair and transparent processing
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Accountability

## Data Protection Law:

May 25, 2018, the European Union's (EU) General Data Protection Regulation (GDPR) takes effect. It's intended to standardize data protection legislation across the EU and update data protection laws to cover previously unforeseen data usage patterns. GDPR mandates that organizations anywhere in the world processing EU citizen data, reassess their data processing controls, and put a plan in place to better protect it.

(Please note: For this documents purposes, Quality Ventilation Systems (UK) Ltd is shown as QVS)

## Policy Scope:

This policy applies to:

- The office of QVS
- Employees of QVS
- All contractors, and anyone working on behalf of QVS
- Suppliers and Customers of QVS if applicable

It applies to all data that the company holds relating to identifiable individuals, this can include: Names of individuals, Postal addresses, Email addresses, Telephone numbers plus any other information relating to individuals.

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## Data Protection Risks

This policy helps to protect QVS from some very real data security risks, including:

**Breaches of confidentiality** – e.g. information being given out inappropriately

**Failing to offer choice** – e.g. all individuals should be free to choose how the company uses data relating to them

**Reputational damage** – e.g. the company could suffer if hackers successfully gained access to sensitive data

## Responsibilities

Everyone who works for or with QVS has some responsibility for ensuring data is collected, stored and handled appropriately

Personnel who handle personal data must ensure that it is handled and processed in line with this policy and data protection principles

### Key areas of responsibility:

- The directors are ultimately responsible for ensuring that QVS meets its legal obligations

### Sue Jones (Data Protection Officer) is responsible for:

- Keeping directors updated about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and related policies, in line with agreed schedule
- Arranging data protection training
- Handling data protection questions from staff and anyone covered by this policy
- Dealing with requests from individuals to see the data that QVS holds about them (also called 'subject access requests' – SAR's)
- Checking and approving any 3<sup>rd</sup> party companies that may handle the company's sensitive data
- Ensuring all systems used for storing data meet acceptable security standards
- Perform regular checks and scans to ensure hardware and software is functioning properly
- Approving any data protection statements attached to communications – emails, letters, website

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## General Staff Guidelines

- The only people able to access data covered by this policy should be those who need it for their work
- Data should not be shared informally. When access to confidential information is required, employees can request it from Sue Jones or Danny Jones, directors of QVS.
- QVS will provide training to help employees understand their responsibilities when handling personal data
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below:
- Strong passwords must be used and should never be shared
- Personal data should not be disclosed to unauthorised people, either within the company or externally
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required it should be deleted and disposed of
- Employees should request help from the data protection officer if they are unsure about any aspect of data protection

## Data Storage

### Paper:

- When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it
- When not required, the paper of files should be kept in a locked drawer or filing cabinet
- There should not be any paper of printouts left in sight of unauthorised people, e.g.: on a desk or printer

### Electronically held data:

- It must be protected from unauthorised access, accidental deletion and malicious hacking attempts:
- Personal data to be stored on designated drives on the QVS hub, and only to be uploaded to an approved cloud computing service
- Personal data to be protected in secure areas of data storage and only available to authorised staff. Authorisation to be by Sue Jones and Danny Jones only
- Data should be backed up frequently, backups should be tested regularly in line with QVS standards
- Data should never be uploaded to tablets or phones
- All laptops and PC's used by QVS personnel should be password protected with approved security software and firewall.
- If laptops are taken off the office premises then they should never be left unattended in a vehicle, and should be kept securely if at home

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## Data Use:

- Personal data is of no value to QVS unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft
- When working with personal data, employees should ensure the screens of their computers are locked when left unattended, or switched off altogether
- Personal data should not be shared informally
- Data must be encrypted before being transferred electronically
- Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data

## Data Accuracy:

The law requires QVS to take reasonable steps to ensure that data is kept accurate and up to date

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible

Data should be kept in as few places as necessary

Staff should take every opportunity to ensure data is updated as soon as they become aware of change or inaccuracy, e.g. if a supplier has a new telephone number, or, if an employee has a change of address

## Subject Access Requests (SAR's):

**All individuals who are the subject of personal data held by QVS are entitled to:**

- Ask what information the company holds about them and why
  - The request should be in writing - either by letter or email - to Sue Jones or Daniel Jones
  - QVS will supply this within a month of the request
- There will be no charge for this type of request
- QVS will always verify the identity of anyone making a subject access request before handing over any information

## Disclosing data for other reasons

In certain circumstances the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, QVS will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the directors and from a legal advisor where necessary.

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## Providing Information:

### QVS aims to ensure individuals

- How their data is being used
- How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company

This is available on request, and a version of the statement is on the company website

Signed by:

*Sue Jones*

Director

18<sup>th</sup> May 2018

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