



Data Protection Policy

Context and Overview

Key Details

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| • Policy Prepared by | Debbie Young |
| • Date Prepared | 10/01/2018 |
| • Date Approved by Management | 10/01/2018 |
| • Date Released | 10/01/2018 |
| • Date for Review | 10/01/2019 |

Introduction:

Young Brothers Transport Ltd needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people, Young Brothers Transport Ltd has a relationship with or may need to contact.

This policy describes how data must be collected, handled and stored to meet the company's data protection standards and to comply with the law.

Why This Policy Exists

This Data Protection Policy ensures Young Brothers Transport Ltd

- Complies with data protection law and follow good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risk of a data breach

Data Protection Law

The Data Protection Act describes how organisations including Young Brothers Transport Ltd must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not to be held any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA) unless that country or territory also ensures an adequate level of protection

People, Risks and Responsibilities

Policy Scope

This policy applies to:

- The head office of Young Brothers Transport Ltd
- All employees of Young Brothers Transport Ltd
- All contractors, suppliers and other persons working on behalf of Young Brothers Transport Ltd

It applies to all data that the company holds, relating to identifiable individuals, even if that information technically falls outside the Data Protection Act. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Plus any other information relating to individuals

Data Protection Risks

This policy helps to protect Young Brothers Transport Ltd from some very real data security risks including

- **Breaches of Confidentiality.** For instance, information being given out inappropriately
- **Failing to Offer Choice.** For instance, all individuals should be free to choose how the company uses data relating to them
- **Reputational Damage:** For instance, the company could suffer if hackers gained access to sensitive data

Responsibilities

Everyone who works for or with Young Brothers Transport Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- **The Management Team** is ultimately responsible for ensuring that Young Brothers Transport Ltd meets its legal obligations

- **The Data Protection Representative [Debbie Young]** is responsible for:
 - Keeping the Management Team updated about data protection responsibilities, risks and issues
 - Reviewing all data protection procedures and related policies in line with an agreed schedule
 - Arranging data protection training and advice for people covered by this policy
 - Handling data protection questions from employees and anyone else covered by this policy
 - Dealing with requests from individuals to see the data Young Brothers Transport Ltd holds about them [also called subject access requests']
 - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data

- **The Management Team** is responsible for
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards
 - Performing regular checks and scans to ensure security hardware and software is functioning correctly
 - Evaluating any third-party services, the company is considering using to store, or process data. For instance, cloud computing services

- **The Management Team** is responsible for
 - Approving any data protection statements attached to communications such as emails and letters
 - Addressing any data protection queries from journalists or media outlets such as newspapers
 - Where necessary working with other staff to ensure marketing, initiatives abide by data protection principles
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Data Storage

These rules describe how and where data should be safely stored. Questions regarding the safe storage of data should be directed to the Management Team.

Where data is stored in manuscript form, it should be kept in a secure place where unauthorised persons cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason

- When not required, the manuscript files should be maintained in secure lockable storage
- Employees should ensure that manuscript documents, printouts etc are not left where unauthorised persons could see them
- Data printouts should be shredded and disposed of securely when no longer required

When data is stored electronically it must be protected from unauthorised access, accidental deletion, and malicious hacking attempts

- Data should be protected by strong passwords that are changed regularly and never shared between employees
- If data is stored on removable media, it should be locked away when not use
- Data should only be stored on designated drives and servers and should only be uploaded to an approved cloud computing service
- Data should be backed up frequently. Those backups should be tested regularly in line with company standard backup procedures
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones
- All servers and computers containing data should be protected by approved security software and a firewall

Data Use

Personal data is of no value to Young Brothers Transport Ltd 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 to loss corruption or theft

- When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.
- Personal data should not be shared informally. It should never be sent by email, as this form of communication is not secure
- Data must be encrypted before being transferred electronically. The It manager can explain how to send data to authorised external contacts
- Personal data should never be transferred outside of the European Economic Area

Data Accuracy

The law requires Young Brothers Transport Ltd to take reasonable steps to ensure data is kept accurate and up to date.

The more important is that the personal data is accurate, the greater the effort Young Brothers Transport Ltd should put into ensuring its accuracy.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets
- Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer details when they call
- Young Brothers Transport Ltd will make it easy for data subjects to update the information Young Brothers Transport Ltd holds about them. For instance, via the company's website
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database
- It is the Managing Director's responsibility to ensure marketing databases are checked against industry suppression files every six months

Subject Access Requests

All individuals who are the subject of personal data held by Young Brothers Transport Ltd are entitled to

- Ask what information, the company holds on them and why
- Ask how to gain access to it
- Be informed of how to keep it up to date
- Be informed on how the company is meeting its data protection obligations

If an individual contact the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email addressed to the company's email address.

The company will always verify the identity of anyone making a subject access request before releasing 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, Young Brothers Transport Ltd will disclose requested data. However, the data provider will ensure the request is legitimate, seeking assistance from the Management Team and from the company's legal advisers where necessary.

Providing Information

Young Brothers Transport Ltd aims to ensure that individuals are aware that their data is being processed and that they understand

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

This is available on request. A version of this statement is also available on the company's web site

Authorised: D A Young

Date: 10th January 2018