

General Data Protection Regulations Policy

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1. Introduction

The purpose of this policy is to enable Elvet Property Services to:

- comply with the law in respect of the data it holds about individuals;
- follow good practice;
- protect Elvet Property Services staff and other individuals
- protect the organisation from the consequences of a breach of its responsibilities.

This policy applies to information relating to identifiable individuals, even where it is technically outside the scope of the General Data Protection Regulations (GDPR), by virtue of not meeting the strict definition of 'data' in the Act.

2. Policy Statement

Elvet Property Services will:

- comply with both the law and good practice
- respect individuals' rights
- be open and honest with individuals whose data is held
- provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently

Elvet Property Services recognise that its first priority under the General Data Protection Regulations (GDPR) is to avoid causing harm to individuals. In the main this means:

- keeping information securely in the right hands, and
- holding good quality information.

Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent Elvet Property Services. will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.

3. Key Risks

Elvet Property Services has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality (information being given out inappropriately).
- Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed
- Failure to offer choice about data use when appropriate
- Breach of security by allowing unauthorised access.
- Failure to establish efficient systems of managing changes to employees, subcontractors, temporary employees leading to personal data being not up to date.
- Harm to individuals if personal data is not up to date
- Failure to offer choices about use of contact details for staff, subcontractors and temporary employees.
- Data Processor contracts
- Breach of requirements under the company accreditations due to the insufficient training on the subject to our employees.

4. Responsibilities

The Company Directors recognise their overall responsibility for ensuring that Elvet Property Services complies with its legal obligations.

The Data Protection Officer is currently Glen Griffiths, with the following responsibilities:

- Briefing the Directors on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Notification
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data

- Approving contracts with Data Processors

Each team or department where personal data is handled is responsible for drawing up its own operational procedures (including induction and training) to ensure that good Data Protection practice is established and followed.

All staff subcontractors and other temporary employees are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Significant breaches of this policy will be handled under Elvet Property Services disciplinary procedures.

Elvet Property Services will have a privacy statement for Data Subjects, setting out how their information will be used. This will be available on request (See Appendix A).

Staff, subcontractors, agency employees, work placements and other methods of engagement with the company will be required to sign a short statement indicating that they have been made aware of their confidentiality responsibilities (See Appendix B).

Where anyone within Elvet Property Services feels that it would be appropriate to disclose information in a way contrary to the confidentiality policy, or where an official disclosure request is received, this will only be done with the authorisation of the Data Protection Officer. All such disclosures will be documented.

5. Security of Data

This section of the policy only addresses security issues relating to personal data. It does not cover security of the building, business continuity or any other aspect of security.

Elvet Property Services has identified the following risks:

- Staff, subcontractors and temporary employees with access to personal information could misuse it.
- Temporary employees could continue to be sent information after they have stopped working for Elvet Property Services, if their records are not updated promptly.
- Staff may be tricked into giving away information, either about supporters or colleagues, especially over the phone, through “social engineering”.

Access to information on the main computer system will be controlled by function, as follows:

- Each employee or other employment mechanism will be provided access to computers, emails and server appropriate to their function within the company, administrated through password protection controlled by the Data Controller for the company.
- Data will only be shared with the authorised organizations in connection with the company regulators, accreditations or in accordance with legal requirements.

6. Data Recording and Storage

Elvet Property Services uses a single database holding basic information.

We will regularly review our procedures for ensuring that its records remain accurate and consistent and, in particular:

- ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data.
- Data on any individual will be held in as few places as necessary, and all staff and temporary employees will be discouraged from establishing unnecessary additional data sets.
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes.

Staff, subcontractors or temporary employees who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.

Elvet Property Services will establish retention periods for at least the following categories of data:

- Members
- Supporters and users of services who elect not to become members
- Volunteers
- Staff
- Subcontractors
- Work placement

Archived paper records of members are stored securely on site. Electronic copies of all commissions are saved within a secure network only accessible by authorised personnel with backup records stored on a central secured external server.

7. Access to Data

Any subject access requests will be handled by the Data Protection Officer.

Subject access requests must be in writing. All employees are required to pass on anything which might be a subject access request to the Data Protection Officer without delay.

Where the individual making a subject access request is not personally known to the Data Protection Officer their identity will be verified before handing over any information.

The required information will be provided in permanent form unless the applicant makes a specific request to be given supervised access in person.

There will be no financial charges to the client for providing electronic versions of the requested information; however, we would look to redeem the costs incurred associated with any printing costs and postage.

Elvet Property Services is committed to ensuring that in principle Data Subjects are aware that their data is being processed and

- for what purpose it is being processed;
- what types of disclosure are likely; and
- how to exercise their rights in relation to the data.

Data Subjects will generally be informed in the following ways:

- Staff: in the staff handbook

Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory and why.

Consent will normally not be sought for most processing of information about staff, with the following exceptions:

- Staff details will only be disclosed for purposes unrelated to their work for Elvet Property Services (e.g. financial references) with their consent.

8. Marketing

Elvet Property Services will treat the following unsolicited direct communication with individuals as marketing:

- promoting any Elvet Property Services, services;
- promoting company events;

- marketing the products of Elvet Property Services

Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opt out. If it is not possible to give a range of options, any opt-out which is exercised will apply to all Elvet Property Services marketing.

Elvet Property Services will only carry out telephone marketing where consent has been given in advance, or the number being called has been checked against the Telephone Preference Service.

Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.

9. Employee Involvement

Information for staff, agency staff, temporary contracts and subcontractor workers is contained in the staff handbook.

All staff who have access to any kind of personal data will have their responsibilities outlined during their induction procedures. Data Protection will be included in foundation training for all new employees regardless whether they are permanent or temporary, including subcontractors.

Elvet Property Services will provide opportunities for staff to explore Data Protection issues through training, team meetings, and supervisions.



Stuart Fisher
Director

17th March 2019

10. Appendix A: Privacy Statement

When you request information from Elvet Property Services, sign up to any of our services or buy things from us, Elvet Property Services obtains information about you. This statement explains how we look after that information and what we do with it.

We have a legal duty under the General Data Protection Regulations (GDPR) to prevent your information falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive.

Normally the only information we hold comes directly from you. Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information, service or goods you need. You do not have to provide us with any additional information unless you choose to. We store your information securely on our computer system, we restrict access to those who have a need to know, and we train our staff in handling the information securely.

If we would like to contact you in future to tell you about other services we provide, and ways in which you might like to support Elvet Property Services you have the right to ask us not to contact you in this way. We will always aim to provide a clear method for you to opt out. You can also contact us directly at any time to tell us not to send you any future marketing material.

You have the right to a copy of all the information we hold about you (apart from a very few things which we may be obliged to withhold because they concern other people as well as you). To obtain a copy, either ask for an application form to be sent to you, or write to the Data Protection Officer at Elvet Property Services.

11. Appendix B: Confidentiality Statement for Staff

When working for Elvet Property Services you will often need to have access to confidential information which may include, for example:

- Personal information about individuals who are supporters or otherwise involved in the activities organised by the company.
- Information about the internal business of the organisation.
- Personal information about colleagues working for the company.

Elvet Property Services is committed to keeping this information confidential, in order to protect people and Elvet Property Services itself. 'Confidential' means that all access to information must be on a need to know and properly authorised basis. You must use only the information you have been authorised to use, and for purposes that have been authorised. You should also be aware that under the General Data Protection Regulations (GDPR), unauthorised access to data about individuals is a criminal offence.

You must assume that information is confidential unless you know that it is intended by Elvet Property Services to be made public.

You must also be particularly careful not to disclose confidential information to unauthorised people or cause a breach of security. In particular you must:

- not compromise or seek to evade security measures (including computer passwords);
- be particularly careful when sending information between colleagues
- not gossip about confidential information, either with colleagues or people outside Elvet Property Services not disclose information — especially over the telephone — unless you are sure that you know who you are disclosing it to, and that they are authorised to have it.

If you are in doubt about whether to disclose information or not, do not guess. Withhold the information while you check with an appropriate person whether the disclosure is appropriate.

Your confidentiality obligations continue to apply indefinitely after you have stopped working for Elvet Property Services.

12. Appendix C: Our Privacy Statement

Elvet Property Services are committed to protecting and respecting your privacy.

This statement (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We keep certain basic information when you visit our website and recognise the importance of keeping that information secure and letting you know what we will do with it.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Elvet Property Services.

This notice only applies to Elvet Property Services activities including our website. If you leave our site via a link or otherwise, you will be subject to the policy of that website provider. We have no control over that policy or the terms of the website and you should check their policy before continuing to access the site.

Trust and transparency

Your trust is very important to us and we are committed to keeping your data safe and secure. We will never sell your personal details to anyone and will only use your data for the purposes we tell you about. We will always explain clearly what information we are collecting about you and why.

Our aim is to put you in control of what happens with your data.

Information we may collect from you

We may collect and process the following data about you:

Information that you provide by filling in forms on our website www.elvetpropertyservices.co.uk. This includes information provided at the time of registering to use our site, subscribing to our service or requesting further services. We may also ask you for information when you report a problem with our site.

When you contact us, we may keep a record of that correspondence. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them. Details of your visits to our site including, but not limited to, traffic data, location data, web server logs, operating system, browser usage and other communication data.

Website related IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type. This is statistical data about our users' browsing actions and patterns and does not identify any individual specifically and we will not collect personal information in this way.

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. The use of cookies helps us to improve our site and to deliver a better and more personalised service. They enable us:

- to estimate our audience size and usage pattern.
- to store information about your preferences, and so allow us to customise our site according to your individual interests.
- to speed up your searches.
- to recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Uses made of the information

When we collect information about you, we will provide you with a summary of what we will do with that information. We may require the information in order to provide you with a service, and we may also need your permission. We will explain that at the time you are asked to provide the information.

We will use the information held about you in the following ways:

For internal record keeping

To analyse and improve our services

To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

To notify you about changes to our service.

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please ensure you do not tick the relevant box situated on the form on which we collect your data. You will always have that choice where appropriate.

Who we will share your information with?

We do not share your information with third parties without your consent unless there is a legitimate business reason, as required by law or other legal processes which requires us to do so. We use third-party suppliers and sub-contractors in some parts of our business who will require some of your

personal information in order to complete work for us. We may disclose your personal information to third parties:

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

If we are under a legal duty to disclose or share your personal data in order to comply with any legal obligation. This includes exchanging information with other companies and organisations for the purposes of fraud or crime prevention or detection and credit risk reduction.

In order to help protect the public funds it receives, Elvet Construction Consultants voluntarily takes part in the National Fraud Initiative (NFI) data matching exercise carried out by the Cabinet Office. This initiative involves the matching of electronic data within and between public and private sector bodies to prevent and detect fraud. This does not require your consent under the Data Protection Act 1998 but we feel it appropriate to inform you. Further information is available on the Government's National Fraud Initiative.

We will never sell your personal information.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have in place suitable physical, digital and operational procedures to safeguard and secure the information we collect and process.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will always inform you at the point of collecting your data if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by not checking the relevant box(es) on the forms we use to collect your data. You can also exercise the right at any time by contacting our Data Protection Officer at support@elvetpropertyservices.co.uk.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You have the right to access the information we hold about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a minimal fee to meet our costs in providing you with details of the information we hold about you. Once an access request has been submitted

formally with the correct information for us to be able to reply, the information will be provided within 30 days.

You have the right to have inaccurate information updated and where notified, we will ensure this is carried out quickly, and you have the right for information to be erased as long as we do not need to maintain that information for legal or other relevant needs e.g. we could not erase all of your information if you are one of our current housing tenants. We will also ensure that anyone we have agreed to share that information with also complies.

Changes to our privacy statement

Any changes we may make to our privacy statement in the future will be posted on this page and we advise that you check this page regularly to keep up to date with any necessary changes.

Contact

Questions, comments, and requests regarding this privacy statement are welcomed and should be emailed to support@elvetpropertyservices.co.uk