

# Data Protection Policy

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## APPROVALS

The signatures below certify that this procedure has been reviewed and accepted.

	Name	Signature	Position	Date
Prepared By	Andrew Holdstock Increase Success Ltd		Consultant	26 <sup>th</sup> April 2024
Approved By	Mary-Jane Pettit Pioneer Clothing Ltd		CEO	26 <sup>th</sup> April 2024

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All	Introduced	1.0	



## Introduction and Purposes

Pioneer Clothing Limited is committed to being transparent about how it collects and uses the personal data of its workforce, and to meeting its data protection obligations. This policy sets out Pioneer Clothing Limited's commitment to data protection, and individual rights and obligations in relation to personal data.

This policy applies to personal data of job applicants, employees, workers, contractors, volunteers, interns, apprentices, and former employees, referred as HR-related personal data.

Pioneer Clothing Limited has appointed Mary-Jane Pettit as the person with the responsibility for data protection compliance within Pioneer Clothing Limited. They can be contacted at [mj@pioneer-clothing.com](mailto:mj@pioneer-clothing.com). Questions about this policy, or requests for further information, should be directed to them.

## *Definitions*

"Personal data" is any information that related to a living individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

"Special categories of personal data" means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

"Criminal records data" means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

## Data protection principles

Pioneer Clothing Limited processes HR-related personal data in accordance with the following data protection principles:

- Pioneer Clothing Limited processes personal data lawfully, fairly and in a transparent manner.
- Pioneer Clothing Limited collects personal data only for specified, explicit and legitimate purposes.
- Pioneer Clothing Limited processes personal data only where it is adequate, relevant, and limited to what is necessary for the purpose of processing.



- Pioneer Clothing Limited keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- Pioneer Clothing Limited keeps personal data only for the period necessary for processing.
- Pioneer Clothing Limited adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction, or damage.

Pioneer Clothing Limited tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons. Where Pioneer Clothing Limited relies on its legitimate interests as the basis for processing data, it will carry out an assessment to ensure that those interests are not overridden by the rights and freedoms of individuals.

Where Pioneer Clothing Limited processes special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with a policy on special categories of data and criminal records data. Pioneer Clothing Limited will update HR-related personal data promptly if an individual advises that their information has changed or is inaccurate. Personal data gathered during the employment, worker, contractor or volunteer relationship, or apprenticeship or internship is held in the individual's personnel file in hard copy or electronic format, or both, and on HR systems. The periods for which Pioneer Clothing Limited holds HR-related personal data are contained in its privacy notices to individuals.

Pioneer Clothing Limited keeps a record of its processing activities in respect of HR-related personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

#### Individual rights

As a data subject, individuals have a number of rights in relation to their personal data.

#### *Subject access requests*

Individuals have the right to make a subject access request. If an individual makes a subject access request, Pioneer Clothing Limited will tell the individual:



- Whether or not their data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- To whom their data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- For how long their personal data is stored (or how that period is decided);
- The individuals rights to rectification or erasure of data, or to restrict or object to processing;
- The individuals right to complain to the Information Commissioner if he/she thinks Pioneer Clothing Limited has failed to comply with their data protection rights and;
- Whether or not Pioneer Clothing Limited carries out automated decision-making and the logic involved in any such decision-making.

Pioneer Clothing Limited will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically unless they agree otherwise.

To make a subject access request, the individual should send the request to [mj@pioneer-clothing.com](mailto:mj@pioneer-clothing.com). In some cases, Pioneer Clothing Limited may need to ask for proof of identification before the request can be processed. Pioneer Clothing Limited will inform the individual if it needs to verify their identity and the documents it requires.

Pioneer Clothing Limited will normally respond to a request within a period of one month from the date it is received. In some cases, such as where Pioneer Clothing Limited processes large amounts of the individual's data, it may respond within three months of the date the request is received. Pioneer Clothing Limited will write to the individual within one month of receiving the original request to tell the individual if this is the case.

If a subject access request is manifestly unfounded or excessive, Pioneer Clothing Limited is not obliged to comply with it. Alternatively, Pioneer Clothing Limited can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which Pioneer Clothing Limited has already responded. If an individual submits



a request that is unfounded or excessive, Pioneer Clothing Limited will notify the individual that this is the case and whether it will respond to it.

### *Other rights*

Individuals have several other rights in relation to their personal data. They can require Pioneer Clothing Limited to:

- Rectify inaccurate data;
- Stop processing or erase data that is no longer necessary for the purposes of processing;
- Stop processing or erase data if the individual's interests override Pioneer Clothing Limited's legitimate grounds for processing data (where Pioneer Clothing Limited relies on its legitimate interests as a reason for processing data);
- Stop processing or erase data if processing is unlawful; and
- Stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override Pioneer FM Limited's legitimate grounds for processing data.

To ask Pioneer Clothing Limited to take any of these steps, the individual should send the request to [mj@pioneer-clothing.com](mailto:mj@pioneer-clothing.com).

### Data security

Pioneer Clothing Limited takes the security of HR-related personal data seriously. Pioneer Clothing Limited has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse, or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Where Pioneer Clothing Limited engages third parties to process personal data on its behalf, such parties do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### Impact assessments

Some of the processing that Pioneer Clothing Limited carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, Pioneer Clothing Limited will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the measures that can be put in place to mitigate those risks.



## Data breaches

If Pioneer Clothing Limited discovers that there has been a breach of HR-related personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. Pioneer Clothing Limited will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

## International data transfers

Pioneer Clothing Limited will not transfer HR-related personal data to countries outside the EEA.

## Individual responsibilities

Individuals are responsible for helping Pioneer Clothing Limited keep their personal data up to date. Individuals should let Pioneer Clothing Limited know if data provided to Pioneer Clothing Limited changes, for example if an individual moves house or changes his/her bank details.

Individuals may have access to the personal data of other individuals and of our customers and clients in the course of their employment, contract, volunteer period, internship or apprenticeship. Where this is the case, Pioneer Clothing Limited relies on individuals to help meet its data protection obligations to staff and to customers and clients.

Individuals who have access to personal data are required:

- To access only data that they have authority to access and only for authorised purposes;
- Not to disclose data except to individuals (whether inside or outside Pioneer Clothing Limited) who have appropriate authorisation;
- To keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- Not to remove personal data, or devices containing or that can be used to access personal data, from Pioneer Clothing Limited's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;
- Not to store personal data on local drives or on personal devices that are used for work purposes; and
- To report data breaches of which they become aware to Mary-Jane Pettit immediately.



Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under Pioneer Clothing Limited's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

## Training

Pioneer Clothing Limited will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter.

Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.

