



## **Data Protection Policy**

To operate effectively and fulfil its legal obligations, VIGILO Training Ltd needs to collect, maintain and use certain personal information about current, past and prospective employees, customers and suppliers and other individuals with whom it has dealings. All such personal information, whether held on computer, paper or other media, will be obtained, handled, processed, transported and stored lawfully and correctly, in accordance with the safeguards contained in the Data Protection Act 2018 (DPA 2018) and the General Data Protection Regulation (GDPR)

The new regulatory environment demands higher transparency and accountability in how we manage and use personal data. It also accords new and stronger rights for individuals to understand and control that use.

The GDPR contains provisions that VIGILO Training Ltd will need to be aware of including provisions intended to enhance the protection of personal data. GDPR requires that we must ensure that our privacy notice is written in a clear, plain way to ensure that staff, clients, suppliers and third-party organisations will understand.

VIGILO Training Ltd is committed to the data Protection Principles under GDPR as detailed in the DPA. These principles require that personal information must:

**1) Process personal data fairly and lawfully.**

VIGILO Training Ltd will make all reasonable efforts to ensure that individuals who are the focus of the personal data (data subjects) are informed of the identity of the Data Protection Officer, the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant. For example,

**2) Process the data for the specific and lawful purpose for which it collected that data and not further process the data in a manner incompatible with this purpose.**

VIGILO Training Ltd will ensure that the reason for which it collected the data originally is the only reason for which it processes those data, unless the individual is informed of any additional processing before it takes place.

**3) Ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed.**

VIGILO Training Ltd will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained. Forms for collecting data will always be drafted with this mind. If any irrelevant data are given by individuals, they will be destroyed immediately.

**4) Keep personal data accurate and, where necessary, up to date.**

VIGILO Training Ltd will review and update all data on a regular basis. It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and everyone should notify VIGILO Training Ltd if, for example, a change in circumstances mean that the data needs to be updated. It is the responsibility of VIGILO Training Ltd to ensure that any notification regarding the change is noted and acted on.

5) **Only keep personal data for as long as is necessary.**

VIGILO Training Ltd undertakes not to retain personal data for longer than is necessary to ensure compliance with the legislation, and any other statutory requirements.

VIGILO Training Ltd will dispose of any personal data in a way that protects the rights and privacy of the individual concerned (e.g. secure electronic deletion, shredding and disposal of hard copy files as, confidential waste). A log will be kept of the records destroyed.

6) **Process personal data in accordance with the rights of the data subject under the legislation.**

Individuals have various rights under the legislation including a right to:

- be told the nature of the information that VIGILO Training Ltd holds and any parties to whom this may be disclosed.
- prevent processing likely to cause damage or distress.
- prevent processing for purposes of direct marketing.
- not have significant decisions that will affect them taken solely by automated process.
- act to rectify, block, erase or destroy inaccurate data.
- request that the Office of the Information Commissioner assess whether any provision of the Act has been contravened.

VIGILO Training Ltd will only process personal data in accordance with individuals' rights.

7) **Put appropriate technical and organisational measures in place against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data.**

All members of staff are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties. VIGILO Training Ltd will ensure that all personal data is accessible only to those who have a valid reason for using it. VIGILO Training Ltd will have in place appropriate security measures e.g.

- ensuring that hard copy personal data is kept in lockable filing cabinets/cupboards with controlled access (with the keys then held securely in a key cabinet with controlled access):
- keeping all personal data in a lockable cabinet with key-controlled access.
- password protecting personal data held electronically.
- archiving personal data which are then kept securely (lockable cabinet).
- placing any PCs or terminals, CCTV camera screens etc. that show personal data so that they are not visible except to authorised staff.
- ensuring that PC screens are not left unattended without a password protected screen-saver being used.

In addition, VIGILO Training Ltd will put in place appropriate measures for the deletion of personal data - manual records will be shredded or disposed of as 'confidential waste' and appropriate contract terms will be put in place with any third parties undertaking this work. Hard drives of redundant PCs will be wiped clean before disposal or if that is not possible, destroyed physically. A log will be kept of the records destroyed.

## **Responsibilities**

- Overall responsibility for ensuring that the Company complies with its data protection obligations rests with Eddie Gilmour, Data Protection Officer.
- It is the responsibility of all employees to ensure that personal information provided to the Company, for example current address, is accurate and up to date. To this end employees are required to inform the Company immediately when changes occur

