

PRIVACY & DATA PROTECTION POLICY

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		Quality, Environmental & H & S Manual	Date: 31.01.23
UK-GDPR Data Protection Policy			

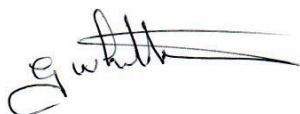
Alba Dewatering Services Limited is fully committed to compliance with the requirements of the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK- GDPR). We recognise that the UK-GDPR, like the previously implemented EU-GDPR, requires all processing of personal data to meet exacting standards.

The company will therefore aim to ensure that all employees, subcontractors, consultants and other persons who have access to any personal data held by or on behalf of Alba, are fully aware and meet these requirements.

Alba hold employees' personal data such as CVs, payroll information, contracts of employment, pension arrangements, tax data, forms of identification, and HR/disciplinary details. This list is not exhaustive. This information is stored in a secure location and only accessible by employees that need it to conduct their duties and comply with legal requirements.

In order to operate efficiently, Alba may occasionally be required to provide customers with our subcontractor's personal data for site authorisation, security, vetting and clearance purposes. This data will be passed on in a secure manner to authorised personnel only.

Compliance is the responsibility of all members of staff. Any deliberate or reckless breach of this policy may lead to disciplinary, and where appropriate, legal proceedings. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Data Protection Officer.



Glyn Whitlam
Managing Director

DATA PROTECTION & PRIVACY POLICY

Overview

We need to gather and use information, or 'Data', as part of our business and to manage our relationship with 'You' – potential clients and the general public. This policy sets out the things we must tell you about data protection. We take the security and privacy of your data seriously and intend to comply with our legal obligations under the Data Protection Act 2018 ('DPA 2018') and the UK General Data Protection Regulation ('UK-GDPR') in respect of data privacy and security.

If you fall into one of these categories, then you are a 'Data Subject' for the purposes of this policy.

The Company is a 'Data Controller' for the purposes of your personal data. This means that we decide how and why we process your personal data. This policy explains how we will hold and process your information. It explains your rights as a 'Data Subject'.

It is intended that this policy is fully compliant with the DPA 2018 and the UK-GDPR. If any conflict arises between those laws and this policy, the Company intends to comply with the DPA 2018 and the UK-GDPR.

Data Protection Principles

Personal data must be processed in accordance with the following 'Data Protection Principles.' It must:

- be processed fairly, lawfully, and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant, and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are responsible for ensuring and demonstrating compliance with these principles.

How We Define Personal Data

'Personal Data' means information which relates to a living person who can be identified from that data (a 'Data Subject') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data. This policy applies to all personal data whether it is stored electronically, on paper, or in/on other materials.

How We Define Special Categories of Personal Data

'Special Categories of Personal Data' are types of personal data consisting of information about:

- your racial or ethnic origin;
- your political opinions;
- your religious or philosophical beliefs;
- your trade union membership;
- your genetic or biometric data;
- your health; and
- your sex life and sexual orientation.
- We may hold and use any of these special categories of your personal data in accordance with the law.

How We Define Processing

'Processing' means any operation which is performed on personal data such as:

- collection, recording, organisation, structuring or storing;
- adaption or alteration; retrieval, consultation, or use;
- disclosure by transmission, dissemination or otherwise making available;
- alignment or combination; and
- restriction, destruction, or erasure.

This includes processing personal data which forms part of a filing system and any automated processing.

How We Will Process Your Personal Data

We will process your personal data (including special categories of personal data) in line with our obligations under the DPA 2018 and UK-GDPR.

We will use your personal data:

- for complying with any legal obligation; or
- if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing. See details of your rights below.

We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without informing the you/Data Subject and the legal basis that we intend to rely on for processing it.

We do not take automated decisions about you using your personal data or utilise profiling methods.

Sharing Your Personal Data

Sometimes we might share your personal data with our contractors and agents to carry out our obligations under our contract with you or for our legitimate interests.

We require those people and companies to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

We do not send your personal data outside the European Economic Area. If this changes, we will inform you. We'll also explain the protections that are in place to protect the security of your data.

Your Data Subject Rights

You have the right to information about what personal data we process, how and on what basis as set out in this policy. You have the right to access your own personal data by way of a SAR (see above). You can correct any inaccuracies in your personal data by contacting the Data Protection Officer.

You have the right to request that we erase your personal data where we were not entitled under law to process it, or where it is no longer necessary to process the data for the purpose for which it was collected. You can request erasure by contacting the Data Protection Officer.

During the process of requesting that your personal data is corrected or erased, or while you are contesting the lawfulness of our processing, you can ask for the data to be used in a restricted way only. To do this, contact the Data Protection Officer.

You have the right to object to data processing where we are relying on a legitimate interest to do so, and you think that your rights and interests outweigh our own and you wish us to stop. You have the right to object if we process your personal data for the purposes of direct marketing.

You have the right to receive a copy of your personal data and, with some exceptions, to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.

With some exceptions, you have the right not to be subjected to automated decision-making. You have the right to be notified of a data security breach concerning your personal data where that breach is likely to result in a high risk of adversely affecting your rights and freedoms.

In most situations we will not rely on your consent as a lawful ground to process your data. If we do request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact the Data Protection Officer.

You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has more information on your rights and our obligations.

Contact Details for Alba Dewatering Services Limited's Data Protection Officer:

Name: Sif Brookes

Address: The Nag Yard, Sapperton Park Courtyard, Marjory Lane, Church Broughton, Derbyshire
DE65 5SL

Phone Number: 01283 585700

Email: DPO@albadewatering.co.uk