



## GENERAL DATA PROTECTION REGULATION DATA PROTECTION POLICY - SPECIFIC TO THE PROCESSING OF GENERAL DATA

### Data Protection Officer

Graeme Cousland, Managing Director, located at the Company address at the foot of the page and contactable on 0141 556 2289 ext 0205, or by e-mail at [graeme.cousland@bcenvirotec.com](mailto:graeme.cousland@bcenvirotec.com)

### Data Controller

Begg Cousland Envirotec Ltd., 205 White Studios, 62 Templeton Street, Glasgow G40 1DA

### Introduction

As an organisation Begg Cousland Envirotec needs to gather and use certain information (personal and sensitive data) about individuals. These individuals can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact. This policy describes how this personal 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 Begg Cousland Envirotec:

- complies with data protection law and follows good practice
- protects the rights of staff, clients and partners
- is open about how it stores and processes individuals' personal and sensitive data
- protects itself from the risks of a data breach

### Data protection law

Data Protection Law describes how we as an organisation must collect, handle and store personal and sensitive data. These rules apply regardless of whether data is stored electronically, on paper or on other materials.

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



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Data Protection Law is underpinned by the following important principles. These principles state that personal data must be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## People, risks and responsibilities

### Policy scope

This policy applies to:

- Begg Cousland Envirotec, located at 205 White Studios, 62 Templeton Street, Glasgow G40 1DA and any other office location that may become applicable;
- all staff and clients of Begg Cousland Envirotec;
- all third parties such as suppliers and others working on behalf of Begg Cousland Envirotec.

It applies to all personal and sensitive data that the company holds relating to identifiable individuals, even if that information technically falls outside of existing Data Protection Law. This can include:

- names of individuals;
- postal addresses;
- email addresses;
- telephone numbers;
- any other information that is relating to individuals



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## Data protection risks

This policy helps to protect Begg Cousland Envirotec 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; and
- reputational damage. For instance, the company could suffer if hackers successfully gained access to personal and sensitive data.

## Responsibilities

Everyone who works for or with Begg Cousland Envirotec has some responsibility for ensuring data is collected, stored and handled appropriately. Everyone must ensure that it is handled and processed in line with this policy and the data protection principles, as contained within Data Protection legislation.

Key areas of responsibility:

- The Directors are ultimately responsible for ensuring that Begg Cousland Envirotec meets its legal obligations in relation to Data Protection Law.
- The data protection officer, Graeme Cousland, is responsible for:
  - keeping the Directors 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 the people covered by this policy;
  - handling data protection questions from staff and anyone else covered by this policy;
  - dealing with requests from individuals to access the personal data Begg Cousland Envirotec 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 Finance Director, Iain Ross, is responsible for IT, and for:
  - ensuring all systems, services and equipment used for storing personal data meets acceptable security standards;
  - performing regular checks and scans to ensure security hardware and software is functioning properly; and
  - evaluating any third-party services the company is considering using to store or process data, for instance cloud computing services.
- The Managing Director, Graeme Cousland, is responsible for:
  - Approving any data protection statements attached to communications such as emails and letters;
  - where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.



## General staff guidelines

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- Begg Cousland Envirotec will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Data should not be shared via any unsecure method.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required and outside of our retention policy, it should be deleted and disposed of securely.
- Employees should request help from their manager or the data protection officer if they are unsure about any aspect of data protection.

## Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the Finance Director or data protection officer. When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

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

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorised people could see them.
- Printed documents which contain confidential, personal or sensitive data should not be left on desks, printers or photocopiers overnight.
- 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 (like a CD or DVD or Memory stick), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers and should only be uploaded to an approved cloud computing service.
- Servers containing personal data should be sited in a secure location, away from general office space.



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- Data should be backed up frequently. These backups should be tested regularly, in line with the company's 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 Begg Cousland Envirotec 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 of loss, corruption or theft:

- Personal data should not be shared informally. In particular, it should never be sent in the body of an email or as an attachment to an email, as this form of communication is not secure.
- Data must be encrypted before being transferred electronically. You should speak with the Finance Director who will explain how to send data to authorised external contacts.
- Personal data should never be transferred outside of the European Economic Area.
- Employees should not save copies of personal data to their own computers.
- Always access and update the central copy of any data.

### Data accuracy

Data Protection law requires Begg Cousland Envirotec to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personal data is accurate, the greater the effort Begg Cousland Envirotec should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- 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's details when they call.
- Begg Cousland Envirotec will make it easy for data subjects to update the information Begg Cousland Envirotec holds about them.
- Data should be updated as inaccuracies are discovered. For instance, if a client can no longer be reached on their stored telephone number, it should be removed from the database.
- Updating of data must be done by a member of the admin team in order to ensure that data is stored correctly.



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## Subject access requests

All individuals who are the subject of personal data held by Begg Cousland Envirotec are entitled to:

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

If an individual should 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 Data Protection Officer at [graeme.cousland@bcenvirotec.com](mailto:graeme.cousland@bcenvirotec.com)

The data controller will aim to provide the relevant data in response to a subject access request within 1 month. The data controller will always verify the identity of anyone making a subject access request before handing over any information.

## Disclosing data for other reasons

In certain circumstances, Data Protection Law allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. There are specific legal documents which the company will obtain from such enforcement agencies in relation to such requests. Under these circumstances, Begg Cousland Envirotec will disclose only the data that is requested. However, the data controller will ensure the request is legitimate, seeking assistance from the Directors and from the company's legal advisers where necessary.

## Providing information

Begg Cousland Envirotec aims to ensure that individuals are aware that the company has a privacy notice setting out how data relating to individuals is used by the company, that their data is being processed, and that they understand:

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

## Data Breaches

If you discover that there has been a breach of personal or sensitive data that may pose a risk to the rights and freedoms of individuals, you must report this in the first instance to the company's data protection officer, Jackie White. The company shall then follow procedures in order to notify the Information Commissioner's Office of the breach within 72 hours of becoming aware of the breach. It is therefore important that all breaches are notified at the earliest opportunity. Failure to notify a breach within these timescales could involve a fine being imposed on the company. The company will record all data breaches regardless of their effect or degree of risk.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will inform the affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken. The importance of notifying the company of a breach is therefore highly significant and a requirement under the current Data Protection Law.