

## GDPR POLICY

### Introduction

National Flexible Ltd. is required to gather and process relevant personal data regarding individuals.

This can include members of staff, applicants, suppliers, customers, business contacts and other people the company 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 GDPR.

### What is the GDPR?

The European Union (EU) has enacted a new set of laws entitled the General Data Protection Regulations (GDPR). These laws go into effect on 25<sup>th</sup> May 2018.

Under the GDPR, EU citizens have the right to choose how their personal data is used and stored. The GDPR is replacing the EU Data Protection Directive, with stricter rules on how a business should handle consumer's personal information.

The GDPR describes how organisations, including National Flexible Ltd, must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or by any other means.

### GDPR compliance

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

The GDPR is underpinned by six important principles. These say that personal data must be:

- Processed lawfully, fairly and in a transparent manner;
- Obtained for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary;
- Accurate and, where necessary, kept up to date;
- Retained only for as long as necessary;
- Processed in an appropriate manner to maintain security.

### Why this policy exists?

This GDPR Policy ensures that National Flexible Ltd.:

- Complies with GDPR and follow good practice;
- Protects the rights of staff, customers and partners;
- Is open about how it stores and processes individuals' data;
- Protects itself from a data breach.

### Scope

This policy applies to all staff, contractors, suppliers and other people working on behalf of National Flexible Ltd.

It applies to all data that the company holds relating to identifiable individuals (personal data).

Personal data covers both facts and opinions about an individual where that data identifies an individual. This includes:

- Names of individuals;
- Postal addresses;
- Email addresses;
- Telephone numbers;
- ...plus any other information relating to individuals.

### Data protection risks

This policy helps to protect National Flexible Ltd. from some very real data security risks, including:

- Breaches of confidentiality – i.e. information being given out inappropriately;

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- Failing to offer choice – i.e. individuals should be free to choose how the company uses data relating to them;
- Reputational damage – i.e. the company could suffer if hackers successfully gained access to personal data.

### Responsibilities

Everyone who works for National Flexible Ltd. has some responsibility for ensuring data is collected, stored and handled appropriately.

Each person that handles personal data must ensure that it is handled and processed in line with this policy and GDPR principles however, the people below have key areas of responsibility.

- The Board of Directors are ultimately responsible for ensuring National Flexible Ltd. meets its legal obligations.
- The Technical Engineer is responsible for cyber security.
- The Data Protection Representative (Martin Astley, Company Accountant) is responsible for:
  - Keeping the board updated about data protection responsibilities, risks and issues;
  - Reviewing data protection procedures and related policies;
  - Providing or arranging staff awareness, training and guidance where necessary;
  - Dealing with subject access requests (requests from individuals to see the data National Flexible Ltd. holds about them);
  - Management of the company IT system maintenance.
- The Marketing Manager is responsible for:
  - Approval of data protection statements attached to emails;
  - Addressing data protection queries from journalists or media outlets;
  - Ensuring marketing databases are checked regularly;
  - 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 manager.
- Employees should keep all data secure by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and not shared.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if found to be out of date.
- Data no longer required should be deleted and disposed of.
- Employees should request help from their line manager or the Data Protection Representative if they are unsure about any aspect of data protection.

### Data Storage

When data is stored on paper, it should be:

- Kept in a secure place where unauthorised people cannot see it;
- Shredded using the shredder in the accounts office & collected on a scheduled basis using a secure waste destruction contractor.

When data is stored electronically, it should be:

- Protected by strong passwords that are changed regularly and not shared;
- When stored on removable media, kept in a secure place when not being used;

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- Only stored on designated devices and servers;
- Backed-up frequently, in line with the company's standard back-up procedures.

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 National Flexible Ltd. 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.

- When working with personal data, employees should ensure they keep it secure and inaccessible to unauthorised people.
- Personal data should not be shared informally.
- Employees should not save copies of personal data to their personal computers.

### Data Accuracy

The law requires National Flexible Ltd. to take reasonable steps to ensure data is kept accurate and up to date.

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 should be held in as few places as necessary.
- Staff should take the opportunity to ensure data is updated e.g. confirming a customer's details when they call.
- Data should be updated as soon as inaccuracies are discovered.

### Subject Access Requests

All individuals who are the subject of personal data held by National Flexible Ltd. are entitled to make a Subject Access Request.

This means they can:

- 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 National Flexible Ltd. is meeting its data protection obligations.

Subject Access Requests from individuals should be made by email, addressed to the Data Protection Representative at [martin@nationalflexible.net](mailto:martin@nationalflexible.net)

Individuals will be charged £10 per Subject Access Requests. The Data Protection Representative will aim to provide the relevant data within 14-days.

The Data Protection Representative will always verify the identity of anyone making a Subject Access Request prior to handing over any information.

### Other Data Disclosures

In certain circumstances, personal data can be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, National Flexible Ltd. will disclose requested data. However, the Data Protection Representative will ensure the request is legitimate, seeking assistance from the board and the company's legal advisors where necessary.

Signed

Date

*George Slack*

*28-06-2022*

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G Slack, Managing Director

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