



# **Data Protection Policy**

## **DATA PROTECTION POLICY**

TPP is a registered Data Controller under the terms of the Data Protection Act 1998 (registration number Z7026477).

The Directors of the Company regularly review/audit the procedures and systems internally to ensure that they comply with best practice and the eight Data Protection principles that are central to the Data Protection Act when dealing with information about individuals:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless one or more of the conditions laid down in the Act are met
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with those purposes
3. Personal data shall be adequate, relevant and not excessive in relation to the purposes for which it is processed
4. Personal data shall be accurate and where necessary, kept up to date
5. Personal data shall be kept for no longer than is necessary for the purpose for which it was processed
6. Personal data shall be processed in accordance with the rights of data subjects under the 1998 Act
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing and accidental loss, destruction or damage to personal data
8. Personnel data shall not be transferred to a country or territory outside the European Economic Area unless that country/territory ensures an adequate level of data protection

Where they consider it appropriate, the Directors make use of external consultants to confirm compliance and suggest improvement to data handling and storage processes.

All employees are given training to understand the importance of data protection and their role in complying with the above Data Protection principles when dealing with personal data.

The Company publishes a Data Protection Policy for all its employees in its Employee Handbook to ensure that:

- each employee is aware of the nature of the information that the Company holds about individuals;
- employees understand the reasons why the Company needs to process this information;
- all employees understand their responsibilities when dealing with information about others.

Employees should refer any queries on Data Protection to the Company's Data Protection Officer.

The following points are highlighted to all employees of the Company:

#### Why the Company processes information on individuals

The Company's day-to-day workings necessarily involve the processing of personal data for individuals both inside and outside the Company. The Company also needs to collect and use personal data about employees for a variety of personnel, employee administration and employee and business management purposes.

#### Types of data kept

The data protection principles apply to personal data that is either automatically processed (e.g. on a database) or which is held in a structured filing system (e.g. a set of personnel files).

The types of personal data that the Company holds and processes include the following examples:-

- name, address, telephone numbers and other contact details;
- date of birth, NI number, immigration status, and marital status;
- contract of employment and offer letters; full details of current and previous positions within the Company, salary, bonus, benefits and details of working time and leave requirements;
- CV's, new employee forms, application forms, details of education, job history and experience (both within the Company and previously) qualifications, and records of any psychometric testing;
- appraisals and details of training; and
- records and documentation relating to any performance review, disciplinary matters or grievances and training records.

## The types of personal data held for other individuals

For example:-

- director/Company secretary details;
- CV's, application forms, details of education, job history and experience and qualifications;
- Contact details for clients and suppliers.

## Sensitive Personal Data

Where it is necessary to process sensitive personal data (e.g. data relating to matters such as health, race, ethnic origin, criminal offences etc), the Company gives reasons to the data subject as to why it is necessary to request and process such data.

## Information relating to use of IT systems

How the Company processes personal data relating to individuals as part of its IT and communications systems.

## How personal data is kept

The storage and security of data in personnel/candidate files, and other paper-based systems and the electronic storage of data

## Accurate and up to date information

The importance of ensuring only accurate and up to date information is kept for only as long as is necessary

## Transfer of personal data to others

Parties that the Company may make some personal data available to, are the Company's advisors, such as solicitors, accountants, benefits and payroll providers, to those providing products or services to the Company (such as IT and other outsourcing providers) and to government and/or regulatory authorities. The need to ensure that personal data shall not be transferred to a country or territory outside the European Economic Area unless an adequate level of data protection is ensured.

### Individuals' rights and responsibilities under this Act

The Data Protection Act gives employees and any other individuals about whom personal data is held, specific rights in relation to the information that is held about them.

### Supplying personal data

Employees are given guidelines on what to do if asked to supply documented or electronic personal data – failure to follow these guidelines could result in disciplinary action.