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# Employment Affairs Guidance

## General Data Protection Regulations (GDPR) Policy

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### Purpose and Scope

This document sets out to all **Hosie Electrical Contracting Ltd.** employees, suppliers and customers (including past and prospective employees and to agency and contract workers) the policy under which **Hosie Electrical Contracting Ltd.** processes the personal data of employees, suppliers, and customers in accordance with the GDPR.

**Hosie Electrical Contracting Ltd.** is required to only process personal data in accordance with the requirements of the GDPR. **Hosie Electrical Contracting Ltd.** takes its responsibility regarding the security of personal data very seriously and ensures that action is taken, and consequences are understood, for any non-compliance with the GDPR and **Hosie Electrical Contracting Ltd.** policies and procedures.

### Personal Data

The GDPR uses the term 'personal data' which can be defined as any information processed by **Hosie Electrical Contracting Ltd.** or on our behalf, which relates to a living individual who can be identified. This can include, but is not limited to, name and address; contact details; date of birth; education and qualifications; bank account details; salary information; performance ratings; training records and details of positions held within the Company. It also includes any expression of opinion about or any indication of our intentions toward that individual.

In addition to the examples given above companies may also process sensitive personal data. This includes information relating to, for example, racial or ethnic origin, and physical or mental health.

Processing can be defined as obtaining, recording or holding the information or carrying out any operation on the data, including:

- Organisation, adaption or alteration
- Retrieval, consultation or use
- Disclosure by transmission, dissemination or otherwise making available
- Alignment, combination, blocking, erasure or destruction

### General Data Protection Regulation Principles

**Hosie Electrical Contracting Ltd.** fully supports the rights afforded to individuals through compliance with the GDPR which are summarised below:

- The right be informed about the collection and use of one's personal data (including what data is held, how, for how long, and for what legal reason, who it is transferred to, and who has access to it)
- The right to access one's data
- The right to rectify one's data
- The right to have one's data deleted (subject to certain conditions)
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision-making and profiling

Please see our attached GDPR privacy statement for a full explanation of how to exercise the above rights.

### **Conditions for Processing Data**

**Hosie Electrical Contracting Ltd.** will only process personal information about employees, suppliers or customers when it is permitted for a lawful reason.

Sensitive personal data may only be processed if one of the following conditions is met:

- The individual has explicitly consented to the processing
- We are required by law to process the information for employment purposes
- We need to process the information in order to protect the vital interests of the individual or another person, for example ensure workers' health & safety and welfare at work, prevent unfair dismissal and preventing discrimination on the grounds of race, sex or disability
- The processing is necessary to deal with the administration of justice or legal proceedings

### **Disclosure of Employee, Supplier, or Customer Personal Data**

**Hosie Electrical Contracting Ltd.** may disclose employees' personal data to reputable third parties such as HMRC; pension schemes and healthcare providers. However, other than as set out above **Hosie Electrical Contracting Ltd.** will not disclose or share employee, supplier or customer personal or personal sensitive data to third parties without obtaining prior permission, unless this is necessary for the purposes of discharging a contract of employment or as required by law. We will use all reasonable endeavours to notify employees beforehand, unless we are legally restricted from doing so.

### **Hosie Electrical Contracting Ltd. Responsibilities**

**Hosie Electrical Contracting Ltd. will ensure that:**

- Regular checks are carried out to monitor and assess new processing of personal data and to ensure the notification to the Information Commissioner is updated to take account of any changes in processing of personal data
- Appropriate procedures are developed and maintained including data breaches
- Appropriate technical and organisational measures are taken against unauthorised or unlawful processing, accidental loss, and destruction or damage to personal data
- All subcontractors who are users of personal information supplied by **Hosie Electrical Contracting Ltd.** are required to confirm that they abide by the requirements of the GDPR with regard to information supplied by us, and their contracts will contain the mandatory data processor clauses to that effect
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them
- There is an ongoing mechanism for maintaining good awareness and practice of data protection matters.

### **Employee Responsibilities**

**Employees will ensure that:**

- Any personal data provided to **Hosie Electrical Contracting Ltd.** is accurate
- Employees update **Hosie Electrical Contracting Ltd.** with any changes to personal data in order that records may be updated accordingly
- Personal data of any kind is not to be left unsecured whilst at work
- All information containing personal data is correctly entered onto **Hosie Electrical Contracting Ltd.** systems by an appropriate person
- All forms of guidance, codes of practice and procedures about the collection and use of employee personal information are observed
- The nature of data processed is the minimum required for the relevant purpose and will not be processed for any additional purpose without the requirements of the GDPR being met
- Information is retained and destroyed in accordance with **Hosie Electrical Contracting Ltd.** policies and statutory time limits.