



CARMELCREST

Carmelcrest Limited

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**GDPR and Privacy Policy**

## GDPR and Privacy Policy

### Context and Overview

Key details:

- Policy prepared by: Adam Field
- Approved by management on: 28/05/2018
- Policy became operational on: 28/05/2018
- Next review date: 26/05/2019

### Introduction

This policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data to comply with GDPR of 2018.

Carmelcrest are committed to:

- Ensuring that all staff are made aware of good practice in data protection
- Providing adequate training for all staff responsible for personal data
- Ensuring that everyone handling personal data knows where to find further guidance
- Ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
- Regularly reviewing data protection procedures and guidelines within the organisation.
- Meeting our legal obligations as laid down by the Data Protection Act 1998
- Ensuring that data is collected and used fairly and lawfully
- Processing personal data only in order to meet our operational needs or fulfil legal requirements
- Taking steps to ensure that personal data is up to date and accurate
- Establishing appropriate retention periods for personal data
- Ensuring that data subjects' rights can be appropriately exercised
- Providing adequate security measures to protect personal data
- Ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues

### Why this Policy Exists

This data protection policy ensures Carmelcrest:

- Complies with GDPR and follow good practice
- Protects the rights of staff, customers and clients
- Is open about how we store and process individuals' data
- Protects itself from the risks of a data breach

## GDPR

The General Data Protection Regulations 2018 describes how organisations – including Carmelcrest Limited – must collect, handle and store personal information.

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

GDPR is underpinned by seven important principles. Carmelcrest will act in the following ways:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

## 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.
- Carmelcrest Limited **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.
- 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, it should be deleted and disposed of.
- Employees **should request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection.

## Data Storage

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 CD, USB or DVD), these should be kept locked away securely when not being used.
- Data should be only stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services**.

- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's standard backdrop procedures.
- Data should **never be saved directly** to laptops or other mobile devices like tablets or smart phones.
- All servers and computing containing data should be protected by **approved security software and a firewall**.

## What Information do we collect from you?

Carmelcrest will collect and process the following data:

- Information provided to us  
Carmelcrest will store information about you that you have provided to us directly. This may be through filling in forms or by any correspondence with us via the phone or email. Information you send will be stored and processed by Carmelcrest; this will include any emails or other electronic messages and any documents, photos or other files.
- Information we will collect through our relationship  
Carmelcrest will collect and store information throughout your time with us; this includes but is not limited to location, employees, projects, working hours and other relevant information.
- Type of information we collect  
The type of data Carmelcrest collect may include, but is not limited to the following:
  - ❖ Identification Information - name, title
  - ❖ Contact detail - (address, telephone number, mobile number, email address)
  - ❖ Employment related information - job title, company, business contact information, CV, employment application
  - ❖ Browsing behaviour - when visiting our site we may collect information regarding browsing behaviour and devices used
  - ❖ Location – We may collect your location data through the IP address
  - ❖ Preferences – We may collect services you are interested in for information packs
  - ❖ Information regarding health – We may collect information in respect to any health data e.g. allergies or conditions
  - ❖ Equality and Diversity – We may collect information should you choose to share it regarding ethnicity, sexuality or beliefs. This information is treated as highly confidential and stored appropriately.
  - ❖ Opinions – We may collect information through surveys in relation to your opinion regarding to services
  - ❖ Customer support – We may collect information provided to our support team

## Why do we collect this information?

We collect this information because:

- Based on our legitimate interest to:
  - ❖ Inform you of our services
  - ❖ Send promotional content
  - ❖ Remember you when you use our forms or download content
  - ❖ Supply, improve and support the services provided
  - ❖ Understand our customer base
  - ❖ Keep our site safe and secure
  - ❖ Defend against complaints or legal claims
  - ❖ Understand the effectiveness of marketing
- Based on contract performance with you, or in order to take steps at your request, examples being:
  - ❖ In performing our obligations under our contract to which you are a party
  - ❖ When applying for a vacancy
- Pursuant to legal obligations of Carmelcrest
  - ❖ The provision of products and services
  - ❖ Data protection
  - ❖ Health and safety
  - ❖ Anti-money laundering
  - ❖ Fraud Investigations
  - ❖ Assisting law enforcement

Any other legal obligations placed upon us. We may also process data on the basis of your explicit consent.

Where we rely on your consent for processing, this will be brought to your attention when the information is collected from you.

We may inform you of any additional purposes for collecting your data when that is collected.

## How you control what information we send you?

You can control whether you wish to receive promotional information from Carmelcrest via mail, email or telephone. To detail your preferences please contact a member of the team through [admin@carmelcrest.co.uk](mailto:admin@carmelcrest.co.uk)

We encourage you to keep your preferences and data accurate and up to date.

## How long do we keep hold of your information?

Carmelcrest will only store data for as long as it is required for the purpose it was collected. Should you wish to be provided with further information, please contact a member of the team through [admin@carmelcrest.co.uk](mailto:admin@carmelcrest.co.uk)

Information stored generally on IT systems, such as email history, is archived and deleted regularly in line with our policies and procedures.

## Automated decision making

Carmelcrest will not use automated decision making tools without the explicit written consent or if it is justifiable in the public interest. We also put into place appropriate measures to safeguard your rights.

Any automated decision making will be in strict accordance with government legislation, policies and procedures.

## Who we may share information with?

Where information is shared with third parties, we will only share the information required for the purpose that it is being shared.

We may disclose personal information to the relevant third party:

- ❖ If we are acquired by a third party, in which case Personal Data will be a transferable asset.
- ❖ To third parties if necessary under contract, for example accurate case study information.
- ❖ If under duty by legal obligations or enforcement to disclose or share personal data.

## How is your data stored and kept secure by us?

Carmelcrest has ensured we have the appropriate security measures in place to prevent any personal information collected from being accidentally lost, used or accessed in an unauthorised manor, altered or disclosed.

We limit access to your personal information to those employees, contractors, third parties who have a business need to know. They will only process information on our explicit instructions and they are subject to a duty of confidentiality.

In respect to any suspected data breach, we have in place robust policies and procedures to deal with this event and will subsequently notify you and any applicable regulator or body of a suspected breach where we are legally required.

## What are your rights in respect to this?

You have the right of the following in respect to data collection, storage and use:

- ❖ To ask us not to process your personal data for marketing purposes
- ❖ To ask us not to process your personal data where it is processed on the basis of legitimate interests
- ❖ Where processed data is based on consent, withdraw said consent at any stage
- ❖ To request any and all data held about you
- ❖ To ask for information we hold to be rectified if incomplete or inaccurate
- ❖ To ask for data to be erased provided the data is no longer necessary for the purposes it was collected, consent is withdrawn, you exercise your right to object, that there is no overriding legal responsibility, the data is unlawfully processed, the data needs to be erased
- ❖ To request the processing of information to be restricted if the accuracy is not correct, the processing is unlawful, the data is no longer necessary, or you exercise your right to object.

Should any issues, concerns or problems be raised in relation to your data or you wish to advise us of inaccuracies please contact us through the following:

By Email:

[Admin@carmelcrest.co.uk](mailto:Admin@carmelcrest.co.uk)

By Telephone:

Bishop's Stortford Head Office – 01992718231

By Mail:

Carmelcrest Limited

Suite 18, Block H, Peek Business Centre, Dunmow Road, Woodside, Bishop's Stortford, CM23 5RG

## Additional Information

If your information changes for any reason please inform our team as soon as possible to ensure that all information is kept accurate and up to date.

If business cards are issued to us as your data, this will be processed only by the individual(s) you share the business card with. This is only shared for business purposes, principally to contact in relation to your role or business services.

## Changes to our GDPR and Privacy Policy

This policy may be updated or changed, if this occurs we will provide you with notice of the change/update.

**Reviewed and authorised by:**

**Ben Spooner**



**Managing Director**

**Date:** 28<sup>th</sup> May 2018

*Review by:* 26<sup>th</sup> May 2019