



General Data Protection Policy

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Introduction

Purpose

We at Metaltech uk Profiles Ltd are committed to being transparent about how we collect and use the personal data of our workforce, customers and suppliers, and to meeting our data protection obligations. This policy sets out the organisation's commitment to data protection, and individual rights and obligations in relation to personal data.

This policy applies to the personal data of job applicants, employees, customers and suppliers.

Metaltech uk Profiles Ltd has appointed Lynda Borland – Office Manager as the person with responsibility for data protection compliance within the organisation. Lynda can be contacted at lynda@mtuk-profiles.com. Questions about this policy, or requests for further information, should be directed to her.

Definitions

"Personal data" is any information that relates to an individual who can be identified from that information.

"Processing" is any use made of data, including collecting, storing, amending, disclosing or destroying it.

"Special categories of personal data" means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

Data protection principles

At Metaltech uk Profiles Ltd we process personal data in accordance with the following data protection principles:

- The organisation processes personal data lawfully, fairly and in a transparent manner.
 - The lawful basis for collecting and processing personal data by Metaltech uk Profiles Ltd is to allow the fulfilment of its contractual obligations between ourselves and our employees, customers and suppliers.
- The organisation collects personal data only for specified, explicit and legitimate purposes.
- The organisation processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- The organisation keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- The organisation keeps personal data only for the period necessary for processing.
- The organisation adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

Metaltech uk Profiles Ltd informs individuals of the reasons for processing their personal data, how we use such data, and the legal basis for processing, in our privacy notices. We will not process personal data of individuals for other reasons.

The only special categories of personal data that we at Metaltech uk Profiles Ltd collect, is medical health surveillance data of our employees in order to protect their health and safety from hazards identified during the risk management process, and information regarding equal opportunities and discrimination data.

Metaltech uk Profiles Ltd will update related personal data promptly if an individual advises that his/her information has changed or is inaccurate.

Personal data is held either electronically on secure systems or hard copy within locked offices. The periods for which the organisation holds personal data are contained in our GDPR activities and processes document.

At Metaltech uk Profiles Ltd we keep a record of our processing activities in respect of personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

Individual rights

As a data subject, individuals have a number of rights in relation to their personal data.

Subject access requests

Individuals have the right to make a subject access request. If an individual makes a subject access request, Metaltech uk Profiles Ltd will inform him/her:

- whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- to whom his/her data is or may be disclosed;
- for how long his/her personal data is stored (or how that period is decided);
- his/her rights to rectification or erasure of data, or to restrict or object to processing;
- his/her right to complain to the Information Commissioner if he/she thinks Metaltech uk Profiles Ltd has failed to comply with his/her data protection rights; and
- whether or not Metaltech uk Profiles Ltd carries out automated decision-making and the logic involved in any such decision-making.

Metaltech uk Profiles Ltd will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form.

If the individual wants additional copies, Metaltech uk Profiles Ltd will charge a fee, which will be based on the administrative cost to Metaltech uk Profiles Ltd of providing the additional copies.

To make a subject access request, the individual should send the request to lynda@mtuk-profiles.com In some cases, Metaltech uk Profiles Ltd may need to ask for proof of identification before the request can be processed. Metaltech uk Profiles Ltd will inform the individual if it needs to verify his/her identity and the documents it requires.

Metaltech uk Profiles Ltd will normally respond to a request within a period of 30 days from the date it is received.

If a subject access request is manifestly unfounded or excessive, Metaltech uk Profiles Ltd is not obliged to comply with it. Alternatively, Metaltech uk Profiles Ltd can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which Metaltech uk Profiles Ltd has already responded. If an individual submits a request that is unfounded or excessive, Metaltech uk Profiles Ltd will notify him/her that this is the case and whether or not we will respond to it.

Other rights

Individuals have a number of other rights in relation to their personal data. They can require Metaltech uk Profiles Ltd to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;
- stop processing or erase data if processing is unlawful;

To ask the organisation to take any of these steps, the individual should send the request to lynda@mtuk-profiles.com.

Data security

At Metaltech uk Profiles Ltd we take the security of personal data seriously. We have controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by specific employees in the proper performance of their duties.

Metaltech uk Profiles Ltd only engages our Workplace Pension, IT and HR providers, to process personal data on our behalf, such parties are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Data breaches

If Metaltech uk Profiles Ltd discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, we will report it to the Information Commissioner within 72 hours of discovery. Metaltech uk Profiles Ltd will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, we will tell affected individuals that there has been a breach, and provide them with information about its likely consequences and the mitigation measures we have taken.

International data transfers

At Metaltech uk Profiles Ltd we will not transfer personal data to countries or companies outside the UK.

Individual responsibilities

Individuals are responsible for helping Metaltech uk Profiles Ltd keep their personal data up to date. Individuals should let Metaltech uk Profiles Ltd know if data provided to the organisation changes, for example if an individual moves house or changes his/her bank details.

Individuals may have access to the personal data of other individuals, and of our customers in the course of their employment. Where this is the case, Metaltech uk Profiles Ltd relies on individuals to help meet its data protection obligations to staff and customers.

Individuals who have access to personal data are required:

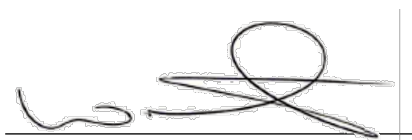
- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the organisation) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer and mobile device access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the organisation's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under our disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

Training

The organisation will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter.

Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.



Wattie Milne
Managing Director

21 May 2018