



Data Protection Policy

HV Cook & Sons Ltd

Gary Bond



H. V. COOK & SON LTD.

Builders and Contractors

Introduction

HV Cook & Sons Limited needs to gather information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation 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 law.

Why this policy exists

This data protection policy ensures HV Cook & Sons Ltd:

- Complies with data protection law and follow good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and process individuals' data
- Protects itself from the risks of a data breach

Data protection law

The Data Protection Act 1998 describes how organisations including HV Cook & Sons Ltd must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

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

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection

People, risks and responsibilities

Policy Scope

This policy applies to:

- The Head Office of HV Cook & Sons Ltd
- All staff and volunteers of HV Cook & Sons Ltd
- All contractors, suppliers and other people working on behalf of HV Cook & Sons Ltd

H. V. COOK & SON LTD.

Builders and Contractors

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Name of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- ... plus, any other information relating to individuals

Data protection risks

This policy helps to protect HV Cook & Sons Ltd from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for HV Cook & Sons Ltd has some responsibility for ensuring data is collected and must ensure data is stored and handled and processed in line with this policy and data protection principles.

The **board of directors**, is ultimately responsible for ensuring that HV Cook & Sons Ltd meets its legal obligations and the **data protection controller, Pauline Bond** is responsible for:

- Reviewing all data protection procedures and related policies
- Arranging data protection training and advice for people covered by this policy
- Handling data protection questions from staff and anyone else covered by this policy
- Dealing with requests from individuals to see the data HV Cook & Sons Ltd holds about them (also called 'subject access requests').
- Checking and approving any contracts of agreement with third parties that may handle the company's sensitive data.

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 managers.

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 in a safe manner.

Data Storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the data protection controller.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

H. V. COOK & SON LTD.

Builders and Contractors

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer
- **Data printouts should be shredded** and disposed of securely when no longer required.

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** (e.g. CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers** and should only be uploaded to **HV Cook & Sons Ltd shared One Drive**.
- Data should be **backed up frequently** – this is carried out by our IT Support Company.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data are protected by **approved security software and a firewall**.

Data use

Personal data is of no value to HV Cook & Sons 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 **the screens of their computers are always locked** when left unattended.
- Personal data should not be shared informally.
- The only personal data HV Cook & Sons Ltd gather is for CITB use only and is transferred via email direct to CITB nominated email address for Course Assessment forms which customers sign to authorise.
- Personal data should **never be transferred outside of the European Economic Area**.
- Employees **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.

Data accuracy

The law requires HV Cook & Sons Ltd to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater effort HV Cook & Sons Ltd should put into ensuring its accuracy.

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 will be held in **as few places as necessary**. Staff should not create any unnecessary additional spots.

Subject access requests

All individuals who are the subject of personal data held by HV Cook & Sons Ltd are entitled to:

- Ask **what information** the company holds about them and why.

H. V. COOK & SON LTD.

Builders and Contractors

- Ask **how to gain access** to it.
- Be informed how the company is **meeting its data protection obligations**.

If an individual contacts the company requesting this information, this is called a "subject access request". The data controller will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, HV Cook & Sons Ltd will disclose requested data. However, the data controller will ensure the request is legitimate, seeking legal advice if necessary.

Providing information

HV Cook & Sons Ltd aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights



Peter Cook
DIRECTOR

Dated 1st November 2018

History of Amendment

Rev	Reviewed by	Date	Checked by	Date
1	Gary Bond	November 2018	Peter Cook	November 2018

H. V. COOK & SON LTD.

Builders and Contractors