Solent Gas Consultants
Experts in Gas Detection

Solent Gas Consultants Ltd.

Provider of technical literature and consultancy services to the gas detection market

Data Protection Policy

Contents

Website: www.solentgasconsultants.com
E-mail: solentgasconsultants@gmail.com Mobile; 07788 548013

Introduction

Solent Gas Consultants Ltd provides services to the global gas detection market. The security and management of data is important to ensure that we can function effectively and successfully for the benefit of our clients and the gas detection sector.

In doing so, it is essential that people's privacy is protected through the lawful and appropriate use and handling of their personal information.

The use of all personal data by NICVA is governed by:

- The General Data Protection Regulation (GDPR);
- The UK Data Protection Act 2018 (DPA);
- The Privacy and Electronic Communications Regulations (PECR).

All Solent Gas Consultants Ltd employees have a responsibility to adhere to the Data Protection Principles outlined in the GDPR, and to this Data Protection Policy.

If you have a question about this Data Protection Policy or an area of concern about data protection matters, please contact us at solentgasconsultants@gmail.com.

Data Protection Principles

There are six data protection principles defined in Article 5 of the GDPR. These require that all personal data be:

- processed in a lawful, fair and transparent manner;
- collected only for specific, explicit and limited purposes ('purpose limitation');
- adequate, relevant and not excessive ('data minimisation');
- accurate and kept up-to-date where necessary;
- kept for no longer than necessary ('retention');
- handled with appropriate security and confidentiality.

We are committed to upholding the data protection principles. All personal data under our control must be processed in accordance with these principles.

Lawful Processing

All processing of personal data must meet one of the six lawful bases defined in Article 6(2) of the GDPR:

- Where we have the consent of the data subject;
- Where it is in our legitimate interests and this is not overridden by the rights and freedoms of the data subject;
- Where necessary to meet a legal obligation;
- Where necessary to fulfil a contract, or pre-contractual obligations;
- Where we are protecting someone's vital interests;
- Where we are fulfilling a public task, or acting under official authority.

Any special category data (sensitive types of personal data as defined in Article 9(1) of the GDPR) must further be processed only in the line with one of the conditions specified in Article 9(2).

The most appropriate lawful basis will be noted in the Data Processing Register (see section on Accountability).

Where processing is based on consent, the data subject has the option to easily withdraw their consent.

Where electronic direct marketing communications are being sent, the recipient should have the option to opt-out in each communication sent, and this choice should be recognised and adhered to by Solent Gas Consultants Ltd.

Data Minimisation and Control

Data collection processes will be regularly reviewed to ensure that personal data collected and processed is kept to a minimum. We will keep the personal data that we collect, use and share to the minimum amount required to be adequate for its purpose. Where we do not have a legal obligation to retain some personal data, we will consider whether there is a business need to hold it.

We will retain personal data only for as long as it is necessary to meet its purpose. In the case of sharing personal data with any third party, only the data that is necessary to fulfil the purpose of sharing will be disclosed.

Anonymisation and pseudonymisation of personal data stored or transferred should be considered where doing so is a possibility.

Accountability

Solent Gas Consultants Ltd has the specific responsibility of overseeing data protection and ensuring that we comply with the data protection principles and relevant legislation. (see section on Role of the Data Protection Officer).

All employees, volunteers, consultants, partners or other parties who will be handling personal data on behalf of Solent Gas Consultants Ltd will be appropriately trained and supervised where necessary.

The collection, storage, use and sharing of personal data will be regularly reviewed by Solent Gas Consultants Ltd.

We will adhere to relevant codes of conduct where they have been identified and discussed as appropriate.

Where there is likely to be a high risk to individuals rights and freedoms due to a processing activity, we will first undertake a Data Protection Impact Assessment if necessary.

Organisational Measures

All devices owned by Solent Gas Consultants Ltd will be passowrd protected where possible, including laptops, mobile devices, and removable media.

All staff, contractors, temporary workers, consultants, partners or anyone else working on behalf of Solent Gas Consultants Ltd and handling personal data are bound by the data protection legislation and this policy.

Where any contractor, temporary worker, consultant, or anyone else working on behalf of Solent Gas Consultants Ltd fails in their obligations under this policy, they shall indemnify Solent Gas Consultants Ltd against any cost, liabilities, damages, loss, claims or proceedings that may arise from that failure.

Procedures for Staff

All members of staff must comply with these procedures for processing or transmitting personal data. In addition, staff should be aware of and adhere to policies around any guidance issued in relation to cyber security and the use of personal data.

Always treat people's personal information with integrity and confidentiality. Don't hand out personal details just because someone asks you to.

Where personal data exists as hard copy, it should be stored in a locked box, drawer or cabinet, and not left where anyone could access it. The transfer of hard copies should be passed directly to the recipient.

Staff may use USB devices for the secure transfer of personal data or sensitive information. No other removable media devices should be used to transfer these types of information without permission from the managing director of Solent Gas Consultants Ltd.

Use marketing lists in CRM where appropriate. These can be used for follow up emails from a training session, or to send reminders prior to an event.

Take care to email the intended recipient (especially where email address autocomplete is turned on). Use the 'bcc' field for emailing several people where using 'to' or 'cc' is not needed.

Rights of Data Subjects

Under data protection laws, data subjects have certain rights:

- Right to be informed - the right to be told how personal data is used in clear and transparent language;
- Right of access - the right to know and have access to the personal data we hold about them;
- Right to data portability - the right to receive data in a common and machine-readable electronic format;
- Right to be forgotten. - the right to have personal data erased;
- Right to rectification - the right to have their personal data corrected where it is inaccurate or incomplete;
- Right to purpose limitation - the right to limit the extent of the processing of personal data.
- Right to object - the right to complain and to object to processing;
- Rights related to automated decision-making and profiling. The right not to be subject to decisions without human involvement.

We will uphold individuals' rights under data protection laws and allow them to exercise their rights over the personal data we hold about them. Privacy information will acknowledge these rights and explain how individuals can exercise them. Most rights are not absolute, and the individual will be able to exercise them depending on the circumstances, and exemptions may apply in some cases.

Any request in respect of these rights should preferably be made in writing to solentgasconsultants@gmail.com, but we will also accept verbal requests. There is no fee for facilitating a request, unless it is 'manifestly unfounded or excessive', in which case administrative costs can be recovered. Requests that are 'manifestly unfounded or excessive' can be refused.

We will take reasonable measures to require individuals to prove their identity where it is not obvious that they are the data subject.

We will respond to the request within one month from the date of request or being able to identify the person, unless it is particularly complex (in which case we will respond in no longer than 90 days).

Reporting of Breaches

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. All members of staff should be vigilant and able to identify a suspected personal data breach. A breach could include:

- loss or theft of devices or data, including information stored on USB drives or on paper;
- hacking or other forms of unauthorised access to any device or email;
- disclosing personal data to the wrong person, through wrongly addressed emails, or bulk emails that inappropriately reveal all recipients email addressesl
- alteration or destruction of personal data without permission;
- Where there is also a likely high risk to individuals' rights and freedoms, Solent Gas Consultants Ltd will inform those individuals without undue delay;
- Solent Gas Consultants Ltd will keep a record of all personal data breaches reported, and follow up with appropriate measures and improvements to reduce the risk of reoccurrence.