

 RT INFRASTRUCTURE SOLUTIONS	Data Protection Policy Statement	PS020
		Issue Number: 02
		Issue Date: 16/05/2018

General Statement of the RT Infrastructure Solutions Limited Duties and Scope

RT Infrastructure Solutions Limited is required to process relevant personal data regarding members of staff, volunteers, applicants, students, and customers as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

Data Protection Controller

RT Infrastructure Solutions Limited has appointed the HR Manager as Data Protection Controller (DPC), who will endeavor to ensure that all personal data is processed in compliance with this Policy and the Principles of the The General Data Protection Regulation (GDPR), (EU) 2016/679, which is directly applicable and fully enforceable in all EU member states. The Freedom of Information Act 2000 and the Protection of Freedoms Act 2012 are also relevant to parts of this policy.

RT Infrastructure Solutions Limited shall so far as is reasonably practicable comply with the Data Protection Principles contained in the Data Protection Act to ensure all data is:

Protection Act to ensure all data is: -

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Secure
- Not transferred to other countries without adequate protection

Personal Data

Personal data covers both facts and opinions about an individual where that data identifies an individual. For example, it includes information necessary for employment such as the member of staff's name and address and details for payment of salary or a student's attendance record and exam results. Personal data may also include sensitive personal data as defined in the Act.

Processing of Personal Data

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent. In some cases, specific organizations may publish a detailed privacy policy relating to their services, use of those services indicates acceptance and may grant additional consent as to how RT Infrastructure Solutions Limited may process personal data. RT Infrastructure Solutions Limited processes some personal data for direct marketing and promotional purposes, data subjects have the right to request an opt-out to these activities, which must be respected.

Sensitive Personal Data

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RT Infrastructure Solutions Limited may, from time to time, be required to process sensitive personal data. Sensitive personal data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings.

Rights of Access to Information

Data subjects have the right of access to information held by RT Infrastructure Solutions Limited, subject to the provisions of the Data Protection Act 1998 and the Freedom of Information Act 2000. Any data subject wishing to access their personal data should put their request in writing to the DPC.

RT Infrastructure Solutions Limited will endeavor to respond to any such written requests as soon as is reasonably practicable and in any event, within 40 days for access to records and 21 days to provide a reply to an access to information request. The information will be imparted to the data subject as soon as is reasonably possible after it has come to RT Infrastructure Solutions Limited attention and in compliance with the relevant Acts.

Exemptions

Certain data is exempted from the provisions of the Data Protection Act which includes the following: -

- National security and the prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon RT Infrastructure Solutions Limited, including Safeguarding and prevention of terrorism and radicalization

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the DPC.

Accuracy

RT Infrastructure Solutions Limited will endeavor to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them.

Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

Enforcement

If an individual believes that RT Infrastructure Solutions Limited has not complied with this Policy or acted otherwise than in accordance with the Data Protection Act, the member of staff should utilise the grievance procedure and should also notify the DPC.

Data Security

RT Infrastructure Solutions Limited will take appropriate technical and organizational steps to ensure the security of personal data. All staff will be made aware of this policy and their duties under the Act.

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RT Infrastructure Solutions Limited and therefore all staff and students are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorized processing of personal data, and against the accidental loss of, or damage to all personal data.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and be encrypted when transported offsite. Other personal data may be for publication or limited publication within RT Infrastructure Solutions Limited, therefore having a lower requirement for data security.

External Processors

RT Infrastructure Solutions Limited must ensure that data processed by external processors, for example, service providers, Cloud services including storage, web sites etc. are compliant with this policy and the relevant legislation.

Secure Destruction

When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with best practice at the time of destruction.


Retention of Data

RT Infrastructure Solutions Limited may retain data for differing periods of time for different purposes as required by statute or best practices, individual departments incorporate these retention times into the processes and manuals. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

RT Infrastructure Solutions Limited may store some data such as registers, photographs, exam results, achievements, books and works etc. indefinitely in its archive.

CCTV

RT Infrastructure Solutions Limited owns and operates a CCTV network for the purposes of crime prevention and detection, and Safeguarding. Where a data subject can be identified, images must be processed as personal data.



Mr A Thorpe
Managing Director
RT Infrastructure Solutions Limited