General Data protection Regulations – GDPR Policy

Introduction

In accordance with the General Data Protection Regulation (GDPR) May 2018, Event Hire Group is committed to the policy of protecting the rights and privacy of individuals, including staff, clients, suppliers and others.

The new regulations demand higher accountability and transparency in how we manage and use personal and financial data of our staff,
clients, suppliers and others. The new regulations also provide new and stronger rights for individuals to understand and control that use.
The GDPR contains provisions that Event Hire Group will need to be aware of as data controllers, including provisions intended to enhance the protection of staff and client's personal and financial data. For example, the GDPR requires that Event Hire Group must ensure that any company privacy notices are written in a clear, plain way that staff and clients will understand.

Event Hire Group needs to process certain information about its staff, clients, suppliers and other individuals with whom it has a relationship for various purposes such as, but not limited to:

1. The recruitment and payment of staff.
2. Staff training, attendance, conduct and accident history
3. Client identification, financial information and transactions history
4. Suppliers' identification, financial information and transactions history

To comply with various legal obligations, including the obligations imposed on it by the General Data Protection Regulation (GDPR) Event Hire Group must ensure that all this information about staff, clients, suppliers and other individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

GDPR Online

Event Hire Group has changed the way that users sign up for marketing communications via company websites. Since 2018, users now have the choice to opt-in to receive marketing communications when they visit Event Hire Group websites. Should they choose to opt-in, users then have the choice of receiving communications by telephone or email. Our marketing communications list is administered by third party software called Mail Chimp. Visitors to our company websites still receive the best experience whether they choose to opt-in for marketing communications or not.
On all the marketing communication emails that Event Hire Group sends out to our opt-in list of users, there is always the option for users to unsubscribe from this list. If the users choose to unsubscribe from the Event Hire Group marketing list, then they will not receive any further marketing communications from us unless they choose to opt back into this marketing list.

Compliance

This policy applies to all Event Hire Group staff. Any breach of this policy or of the Regulation itself will be considered an offence and the disciplinary procedures will be invoked.
As a matter of best practice, other support businesses or individuals working with Event Hire Group and who have access to personal
information, will be expected to read and sign that they agree to comply with this policy.
This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments to the GDPR and other legislation.

General Data Protection Regulation (GDPR)

This piece of legislation comes into force on the 25th of May 2018. The GDPR regulates the processing of personal data and protects the rights and privacy of all living individuals (including children), for example by giving all individuals who are the subject of personal data a general right of access to the personal data which relates to them. Individuals can exercise the right to gain access to their information by means of a 'subject access request'.

Personal data is information relating to an individual and may be in hard or soft copy (paper/manual files; electronic records; photographs; CCTV images) and may include facts or opinions about a person.

Responsibilities under the GDPR

Event Hire Group is ultimately responsible for controlling the use and processing of the personal data. The company has appointed a Data Protection Officer (DPO), currently the Groups Marketing Director who is available to address any concerns regarding the data held by the company and how it is processed, stored and used. The DPO is responsible for all day-to-day data protection matters and will be responsible for ensuring that all members of staff and relevant individuals abide by this policy, and for developing and encouraging good information handling within the company.
If any member of staff suspects that their PC / workstation / work files show any unusual activity or usage, they must inform their duty manner immediately (signage is displayed in all company offices) who, if necessary, will escalate this concern to the Data Protection Officer (DPO) who, if necessary, will involve our IT Support.
Compliance with the legislation is the personal responsibility of all members of staff who process personal information. Businesses and Individuals who provide personal data to Event Hire Group are responsible for ensuring that the information is accurate and up to date.

Data Protection Principles

Under the legislation, it is the responsibility of every data controller to process any personal data in accordance with the eight data protection principles. Event Hire Group undertakes to adhere to the eight principles which are, in effect, a code of good practice for processing personal data:

1. Personal data shall be processed fairly and lawfully. When deemed necessary, Event Hire Group will make all reasonable efforts to ensure that individuals who are the focus of the personal data are informed of the purposes of the data processing, any third-party disclosure that is envisaged, an indication of the period for which the data will be kept, and any other information which may be relevant.
2. The data shall be processed for the specific and lawful purpose for which it was collected and not further process the data in a manner incompatible with this purpose. Event Hire Group will ensure that the reason for which it collected the data originally is the only reason for which it processes that data, unless the individual is informed of any additional processing before it takes place.
   The personal data obtained should be adequate, relevant and not excessive in relation to the purpose for which it is processed. Event Hire Group will not seek to collect any personal data, which is not strictly necessary for the purpose for which it was obtained.
3. Personal data shall be accurate and, where necessary, up to date. Event Hire Group will review and update all data on a regular basis. It is the responsibility of the individuals to give their personal data to ensure that this is accurate, and individuals should notify the company of any changes that may require updating. The company is then responsible for ensuring that the change is noted and acted on

4. Personal data processed for any purpose will only be kept for as long as is necessary for that purpose. Event Hire Group will carry out a regular review of the information held and if no longer required, will dispose of the personal data ensuring that the rights and privacy of the individual concerned are protected (secure electronic deletion, shredding and disposal of hard copy files as confidential waste). A log will be kept of the records destroyed.
5. Process personal data in accordance with the rights of the data subject under the legislation. Individuals have various rights under the legislation including a right to:
   - Be told the nature of the information the company holds and any parties to whom this may be disclosed.
   - Preventing processing is likely to cause damage or distress.
   - Prevent processing for purposes of direct marketing.
   - Be informed about any automated process that may significantly affect them.
   - Not having significant decisions that may affect them taken solely by an automated process.
   - Sue for compensation if they suffer damage by any contravention of the legislation.
   - Take action to rectify, block, erase or destroy inaccurate data.
   - Request that the Office of the ICO assess whether any provision of the Act has been contravened.
6. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of, or damage to personal data. All Event Hire Group staff will ensure that all personal data is accessible only to those who have a valid reason for using it. Event Hire Group will have in place appropriate security measures:
   - Keeping all personal data secure in a lockable cabinet.
   - Password protecting personal data is held electronically.
   - Archiving personal data which is then kept securely in a lockable cabinet.
   - Ensuring all PCs or terminals, CCTV camera screens that may show personal data are not visible except for authorised staff.
   - Ensuring that PC screens are not left unattended without a password protected screensaver.
   - Manual records will be shredded or disposed of as confidential waste.
   - Hard drives of redundant PCs will be wiped clean before disposal or destroyed physically.
   - A log will be kept of the records destroyed.
   - This policy also applies to staff who process personal data when working at home or on site.
7. Personal data shall not be transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

   Event Hire Group will not transfer data to such territories without the explicit consent of the individual. This also applies to publishing information on the Internet - because transfer of data can include placing data on a website that can be accessed from outside the UK- so Event Hire Group will always seek the consent of individuals before placing any personal data (including photographs) on its website. If
   Event Hire Group collects personal data in any form via its website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.
   More detailed guidance on how to comply with these principles can be found in the Data Protection Code of Practice.

Consent as a basis for processing

Although it is not always necessary to gain consent from individuals before processing their data, it is often the best way to ensure that data is collected and processed in an open and transparent manner. Consent is especially important when Event Hire Group is processing any sensitive data, as defined by the legislation. Event Hire Group understands consent to mean that the individual has been fully informed of the intended processing and has signified their agreement, without having any undue influence exerted upon them. Consent cannot be inferred from non-response to communication. Consent obtained on the basis of misleading information will not be a valid basis for processing.

Subject Access Rights (SARs)

Individuals have a right to access any personal data relating to them which is held by the company. Any individual wishing to exercise this
right should apply verbally or in writing to the company. Any member of staff receiving a SAR should forward it to the Marketing Director.
Under the terms of the legislation, any such request must be complied with within 1 month.

Right to Erasure (Right to be Forgotten)

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay
and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed

- The data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing
- The data subject objects to the processing pursuant to Article 21 (1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21 (2)
- The personal data has been unlawfully processed
- The personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject
- Personal data has been collected in relation to the offer of information society services referred to in Article 8 (1). A record will be kept of all requests and actions relating to Right of Erasure.

Disclosure of Data

Only disclosures which have been notified to and authorised by the company can be released and therefore staff should exercise caution
when asked to disclose personal data held on another individual or third party.
Event Hire Group undertakes not to disclose personal data to unauthorised third parties, including family members, friends, Government bodies and in some circumstances, the police.
Legitimate disclosures may occur in the following instances:

- The individual has given their consent to the disclosure.
- The disclosure has been notified of the individual and is in the legitimate interests of the company.
- The disclosure is required for the performance of a contract.
- Information and Images in marketing materials.

Personal Data Breaches

If any member of staff suspects that their PC / workstation / work files show any unusual activity or usage, they must inform their manager immediately who, if necessary, will escalate this concern to the Data Protection Officer (DPO) who, if necessary, will include IT Support.
GDPR introduces a duty on all organisations to report certain types of personal data breach to the relevant supervisory authority. This must be done within 72 hours of becoming aware of any breach.
If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, the individual must be informed without undue delay.
Personal data breaches can include:

- Access by an unauthorised third party
- Deliberate or accidental action (or inaction) by a controller or processor
- Sending personal data to an incorrect recipient
- Computing devices containing personal data being lost or stolen
- Alteration of personal data without permission
- Loss of availability of personal data

If a data breach takes place or is suspected, the Branch manager is to be informed, who will inform the company DPO. The IT support company will, if required, be notified and can assist in assessing the severity of the breach. It is important that this is done as soon as possible so an assessment can be made as to the severity of the resulting risk breach could have to people's rights and freedoms.

Procedure for review

This policy will be updated as necessary to reflect best practice or future amendments made to the General Data Protection Regulation (GDPR) May 2018 and Data Protection Act 1998. Please follow this link to the ICO's website https://ico.org.uk/ which provides further detailed guidance on a range of topics including individuals' rights, exemptions from the Act, dealing with subject access requests, how to handle requests from third parties for personal data to be disclosed etc.
In particular, you may find it helpful to read the Guide to Data Protection which is available from the website.
Please follow this link to the ICO's website https:/ico.org.uk/

The company takes its responsibilities towards GDPR very seriously and strives to remain compliant and current with any changes either legislatively or to industry's best practice.

Company registration: ICO Certificate of Registration Reference – ZA243435

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