

Document Reference <b>JG/QU/POL/002</b>	Business Function <b>Quality</b>	
<b>Data Protection Policy (GDPR)</b>		
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## DATA PROTECTION POLICY

### 1. INTRODUCTION

- 1.1 James Gibb residential factors (JGRF) needs to gather and use certain information about its employees, clients, suppliers/ contractors and other stakeholders to operate its business and comply with the requirements of the General Data Protection Regulations (GDPR), (Regulation (EU) 2016/679), (in force from May 2018). This Policy is based on this piece of legislation.
- 1.2 James Gibb Property Management Ltd, (owner of JGRF), is registered with the Information Commissioner's Office as a data controller.
- 1.3 This policy helps to protect JGRF from data security risks, including:
- Breaches of confidentiality, for example, information given out inappropriately
  - Failing to offer choice, for example, all individuals should be free to choose how the company uses data relating to them, (e-mail addresses etc.)
  - Reputational damage the company could have if hackers gained access to sensitive data.
- 1.4 The JGRF Data Protection Procedure adopts and complies with the Data Protection Principles as set out in the GDPR which are that personal data shall:
- be processed fairly and lawfully and where it is clear to data subjects, (i.e. staff member, client), what JGRF is doing with their personal data.
  - be obtained for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
  - be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed.
  - be accurate and kept up to date.
  - not be kept for longer than is necessary for the purpose or purposes required.
  - be processed in accordance with the data subjects' rights.
  - have in place appropriate technical and organisational measures against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal information.

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- not be transferred to a country or territory outside the European Economic Area 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.

1.5 These principles apply to all data that the company holds which can include:

- Names of individuals
- Postal addresses
- E-mail addresses
- Telephone numbers
- Emergency contact details
- Bank details
- plus, any other relevant information relating to individual.

1.6 All employees who process or use personal information, on behalf of JGRF, must ensure that they follow these principles always. Guidelines for staff will form part of the Data Protection Procedure.

1.7 To ensure that this happens JGRF, has developed this Data Protection Policy and accompanying Procedure.

## 2. AIMS AND OBJECTIVES

2.1 The key aims and objectives of this policy are to ensure JGRF:

- Complies with data protection regulations and follows good practice.
- Protects the rights of individuals by ensuring that all personal data held is used appropriately and lawfully,
- Is transparent about how it stores and processes individuals' data
- Protects itself from the risks of a data breach.

## 3. RESPONSIBILITIES

3.1 The Board of Directors of James Gibb Property Management Ltd (JGPM) has overall responsibility for ensuring that the company meets its legal obligations in relation to Data Protection.

3.2 The Data Protection office, Catherine Flanagan is responsible for:

- Keeping the board updated about data protection responsibilities, risks and issues
- Reviewing all data protection Procedure and related policies, in line with an agreed schedule.
- Arranging data protection training and advice for the 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 JGRF holds about them (also called "subject access requests").
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.

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3.3 The I.T. Provider, Portal Technologies and CPL, is responsible for:

- Ensuring all systems, services and equipment for storing data meet acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning properly.
- Evaluating any third-party service, the company is considering using to store or process data. For example, cloud computing services, including data backup.

3.4 The Marketing Company, Fat buzz is responsible for:

- Approving any data protection statements attached to communications such as emails and letters.
- Addressing any data protection queries from journalists or newspapers.
- Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

3.5 All data (subjects) are responsible for ensuring that they provide JGRF with accurate and up to date personal information, and that they inform JGRF of any changes. JGRF cannot be held responsible for any errors unless we have been informed of changes in data.

3.6 Those employees who are responsible for collecting, processing, storing and sharing information about data subjects must comply with the GDPR and this Data Protection Policy and associated Procedure.

**4. PUBLICATION AND REVIEW**

4.1 This Data Protection Policy is given to all new employees at Induction and is available to all employees via the company intranet drive.

4.2 This policy will be monitored and reviewed every two years or more frequently as legislation dictates.

This Policy statement is made on the authority of the Chief Executive

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