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|  Campbell & Kennedy Maintenance <i>Attitude is everything</i> | Data Controls Policy | IMPL-5 | |
| | | Revision: | 4.0 |
| | | Date: | 28/08/2023 |
| | | Approved by | GK |

Data Controls Policy

Data Control Principles

Campbell & Kennedy Maintenance Ltd is wholly committed to adhering to the principles of the Data Protection Act. This means that we not only value the information we manage and/or retain but we also ensure that access to such is limited to authorised users only. To this end we have implemented this data controls policy to ensure that we can provide adequate and effective protection of any information we manage. It is expected that all data users (Campbell & Kennedy Maintenance Ltd staff and other authorised individuals/entities) will not only work within these policy guidelines but will also operate within the spirit and ethics of protecting customer information from abuse and misuse.

Manual Data

All hard copy information shall be used for its intended purposes only. Once the said information has achieved its intended purposes it shall be:

- a) Scanned and electronically attached to the relevant customer database record.
- b) Or, scanned and appropriately named and stored within the relevant electronic documents folder.
- c) And/or, securely shredded/destroyed.

All hard copy information received shall be date stamped prior to processing.

All printed output should be collected immediately and not rendered, discarded or otherwise, viewable for any longer than is necessary.


All printed output should be controlled in keeping with the principles of this data policy and the data protection act.

All used/expired printed output/hard copy should be securely shredded/destroyed once its purpose has been achieved.

No staff member, or authorised individual/entity, shall be allowed to note down any customer information on paper or any system other than those authorised/governed by **Campbell & Kennedy Maintenance Ltd**.

No customer information is to be taken out with the company premises without authorisation from your Line Manager/Company Director.

Campbell & Kennedy Maintenance Ltd employs a clear desk policy.

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Campbell & Kennedy Maintenance Ltd employ an IT support company to ensure all IT systems are protected from virus attack(s) and unauthorised access. All system users have their own personal login credentials. All users will have varying levels of system access dependent on their individual authorisation privileges. Third party users are subject to extra security measures via remote access policies. All system access & use is subject to ongoing monitoring, review and access restrictions/removal should it be deemed appropriate in the interests of security.

All users must adhere to the company policy on IT system 'acceptable use'.

You should not let anybody know your password(s) at any time.

All users should lock their workstation PCs/Laptops etc. when not working with or within the immediate vicinity of their computer system.

No customer or personal information is to be emailed, or otherwise electronically transported, to an external 3rd party without the authorisation of your Line Manager/Company Director.

Web Data

Campbell & Kennedy Maintenance Ltd employs a 'Privacy Policy' which governs electronic information display/transference which extends to all e-storage systems and all company owned websites.

Campbell & Kennedy Maintenance Ltd (web) Privacy Policy is as follows: -


The site editor takes your right to privacy seriously and wants you to feel comfortable using this web site. This privacy policy deals with personally-identifiable information (referred to as "data" below) that may be collected by this site. This policy does not apply to other entities that are not owned or controlled by the site editor, nor does it apply to persons that are not employees or agents of the site editor, or that are not under the site editor's control. Please take time to read this site's Terms of use.

1. Collection of data

Registration for an account on this site requires only a valid e-mail address and a user name that has not been chosen already. You are not required to provide any other information if you do not want to. Please be aware that the user name you choose, the e-mail address you provide and any other information you enter may render you personally identifiable, and may possibly be displayed on this web site intentionally (depending on choices you make during the registration process, or depending on the way in which the site is configured) or unintentionally (subsequent to a successful act of intrusion by a third party). As on many web sites, the site editor may also automatically receive general information that is contained in server log files, such as your IP address, and cookie information. Information about how advertising may be served on this site (if it is indeed the site editor's policy to display advertising) is set forth below.

2. Use of data

Data may be used to customise and improve your user experience on this site. Efforts will be made to prevent your data being made available to third parties unless (i) provided for otherwise in this Privacy Policy; (ii) your consent is obtained, such as when you choose to opt-in or opt-out for the sharing of data; (iii) a service provided on our site requires interaction with a third party,

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or is provided by a third party, such as an application service provider; (iv) pursuant to legal action or law enforcement; (v) it is found that your use of this site violates the site editor's policy, terms of service, or other usage guidelines, or if it is deemed reasonably necessary by the site editor to protect the site editor's legal rights and/or property; or (vi) this site is purchased by a third party, in which case that third party will be able to use the data in the same manner as set forth in this policy. In the event you choose to use links displayed on this web site to visit other web sites, you are advised to read the privacy policies published on those sites.

3. Cookies

Like many web sites, this web site sets and uses cookies to enhance your user experience — to remember your personal settings, for instance. Advertisements may display on this web site and, if so, may set and access cookies on your computer; such cookies are subject to the privacy policy of the parties providing the advertisement. However, the parties providing the advertising do not have access to this site's cookies. These parties usually use non-personally-identifiable or anonymous codes to obtain information about your visits to this site. You can visit the Network Advertising Initiative if you want to find out more information about this practice, and to learn about your options.

4. Minors

The site editor might not allow persons who are aged thirteen or younger to become members of this site. For more information, please contact the site administrator.

5. Editing or deleting your account information

You are provided with the ability to edit the information stored for your user account information during registration, by visiting your user account control panel. You can request that your user account be deleted; to do so, please contact the site administrator. Content or other data that you may have provided, and that is not stored within your user account, such as articles published, may continue to remain on the site at the site editor's discretion, even after your user account is deleted. Please see the site's Terms of Use for more information.

6. Changes to this privacy policy

Changes may be made to this policy from time to time. You will be notified of substantial changes to this policy either by through the posting of a prominent announcement on the site, and/or by a mail message sent to the e-mail address you have provided, which is stored within your user settings.

7. No Guarantees

While this privacy policy states standards for maintenance of data, and while efforts will be made to meet the said standards, the site editor is not in a position to guarantee compliance with these standards. There may be factors beyond the site editor's control that may result in disclosure of data. Consequently, the site editor offers no warranties or representations as regards maintenance or non-disclosure of data. 8. Contact information: If you have any questions about this policy or about this web site, please feel free to contact the site administrator.

Data passed to third parties

All information passed to authorised 3rd parties must conform to this policy and have signed the data protection policy declaration.

Human Resource Files

All human resource information is securely stored within the HR files cabinets accessible only by the Human Resource manager and company Managing Director.

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Marketing


Campbell & Kennedy Maintenance have adopted an 'opt out' principle for the purposes of sales and marketing development. Any customer who wishes to 'opt out' of marketing can do so verbally or in writing and this request will be carried out within 2 working days from original request. The **Campbell & Kennedy Maintenance** 'Customer Records Management (CRM)' system contains an 'opt out' facility.

Reporting Breaches

If you know or suspect anyone of not adhering to, or clearly breaching, this policy or the principles of the data protection act then please advise your immediate Line Manager AND the company's registered Data Controller (**Lynne Prior**) of this immediately. **Campbell & Kennedy Maintenance Ltd** record all reported breaches, potential or actual, in the data protection breach log. This log is securely stored by the company's registered DataController.

Declaration

This policy statement will be regularly reviewed and updated, as necessary. The management team endorses these policy statements and are fully committed to their implementation.

Signed  Date: 28/08/2023

G. Kennedy, Director