

SOP 206

GENERAL DATA PROTECTION REGULATION (GDPR)

STAFF PRIVACY NOTICE

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GENERAL DATA PROTECTION REGULATION (GDPR): PRIVACY NOTICE

Introduction:

This document refers to personal data, which is defined as information concerning any living person (i.e. data subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of the data subjects. The rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted data within the European Union.

It should be noted that GDPR does not apply to information already in the public domain.

METEC Consulting Engineers (METEC) is pleased to provide the following Privacy Notice:

- METEC is committed to protecting the privacy and security of your personal information.
- This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).
- It applies to all staff and Directors.

METEC is a consulting engineering practice which has the capacity to be a "data controller". This means that in addition to the type of business we are, we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former staff members and directors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles:

We will comply with data protection law which says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

How is your personal information collected?

We collect personal information about all staff members through the application and recruitment process.

We may sometimes collect additional information from third parties including customers, suppliers and other referees or in order to perform other background checks throughout the application process.

How we use your personal data:

METEC uses the information collected from you to perform the contract we have entered into with you to provide you with the benefits of being a staff member. METEC also acts on behalf of its Clients in the capacity of data processor. When working exclusively as a data processor, METEC will be acting on the instruction of its Client and will work hard to ensure that the Client is fully GDPR compliant.

Change of purpose:

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Personal data will be collected about you from your curriculum vitae and from your induction forms that you will need to fill in when you join our company, but personal information may also be obtained about you from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses.

METEC Consulting Engineers will use such information to identify its visitors. METEC may also collect statistics about the behaviour of visitors to our website and social media sites.

METEC's website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Our website uses cookies to help METEC identify and track visitors and their website access preferences.

⇒ *METEC website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before visiting METEC's website.*

Any information METEC Consulting Engineers holds about you encompasses all the details we hold about you and any transactions including any third-party information we have obtained about you from public sources and/or references provided by you in the course of your application.

Legal basis for processing any personal data:

The legal basis for processing your personal data is to meet METEC Consulting Engineers contractual obligations to its staff members to provide employment.

Consent:

We do not need your consent to process your personal data in order to perform our contractual obligations to you. In limited circumstances, we may approach you for your written consent to allow us to process certain data or particularly sensitive data.

If we do so, we will provide you with full details of the information that we may need to use and the reason we need it, so that you can carefully consider whether you wish to consent.

You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Data sharing:

We may have to share your data with third parties, including third-party service providers and other entities. We require third parties (IT provider, accountant, financial/pension expert, etc.) to respect the security of your data and to treat it in accordance with the law.

If we do, you can expect a similar degree of protection in respect of your personal information.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities?

We may share your personal information with other entities on company social events (trips and/or outings) as part of our regular team-building exercises and well-being.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Retention Policy:

METEC Consulting Engineers will process personal data during the duration of any contract and will continue to store only the personal data needed for two years after the contract has expired to meet any legal obligations. After two years any personal data not needed will be deleted.

Rights of access, correction, erasure, and restriction:***Your duty to inform us of changes:***

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information:

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact any of the directors.

What we may need from you:

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent:

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact please contact any of the directors. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Personal data storage:

Personal data associated with METEC staff is held on our servers in a protected folder containing the following information:

personal data held by Metec	reason for retention
First name / surname	So we know who you are
Home address	In case of emergency
Personal email address	In case of emergency
Personal phone No.	In case of emergency
Date of Birth	
PPS No.	For salary remuneration
Vehicle type and registration	For expenses remuneration
Bank details (IBAN / BIC / account. No.)	For salary remuneration
Additional training details (i.e. safe pass / first aid etc.)	Additional information that may be useful to the company
Medical details (i.e. impaired vision or hearing/epilepsy etc.)	Additional information that may be of importance to ensure your safety / working conditions
Spouse / Next of Kin contact details	In case of Emergency

**Please note, that items highlighted in light green in the table above are not accessible to all staff, but only to directors and the accounts manager located on a hidden drive.*

Staff GDPR key best practices:

The following is a list of best practices that staff members including directors, can follow in order to minimise unwanted sharing of personal and Client data:

- ✳ **Only** use work email address for business correspondence
- ✳ **Always** lock your Laptop or PC when away from it (even if it is only for a few minutes)
- ✳ **Never** leave business or personal papers on your desk when away from it
- ✳ Any documents or spreadsheets that contain personal information should be **password protected**
- ✳ All mobile phones **should have PIN** or **password** access enabled
- ✳ All personal computers and laptops **should be password protected**
- ✳ Password should be as strong as possible e.g.: "**password**" is poor whilst the use of mixed upper and lower case letters and numbers is very strong, e.g.: **Ph0N@792**
- ✳ Password protection **should be atomically enabled** within 15 mins of being idle
- ✳ PC's and laptops **should be encrypted** in case of theft
- ✳ **Never** open suspicious email
- ✳ Always **double check** the names on your 'send to' email list before you send it
- ✳ **Never post confidential info on social media**
- ✳ Work as a team by helping each other to comply with the above
- ✳ Data breaches must be reported to your Data Protection Officer immediately

GDPR ROLES AND EMPLOYEES

METEC have designated *Liam Madden* and *James Murphy* as METEC's Data Protection Coordinators (DPC) and have appointed a data privacy team to develop and implement our roadmap for complying with the new data protection Regulation. The team are responsible for promoting awareness of the GDPR across the organisation, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures. The team members are refreshed/reselected every six months.

METEC understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans and continued GDPR policies.

We have implemented an employee training program specific to GDPR which will be provided to all employees prior to 25th May 2018, and forms part of our induction and annual training program.

If you have any questions about our preparation for the GDPR, please contact either of our Data Protection Coordinators or Directors.

CHANGES TO THIS PRIVACY NOTICE:

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Signed,

Bernard Denver
Director

Signed,

James Murphy
Data Protection Coordinator
and CAD Manager