



NEW ERA ENTERPRISES (E. LANCS.) LTD

DATA PROTECTION POLICY

New Era follows the requirements of the General Data Protection Regulation (GDPR) to promote high standards in the handling of personal information and so protect the individual's right to privacy.

New Era holds information about living individuals in electronic format and on paper and follows the six data protection principles of good information handling. Article 5 of the GDPR requires that all personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals.
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods.
- processed in line with the rights of the individual.
- kept secure; and
- not transferred to countries outside the European Economic Area unless the information is adequately protected.

Personal information covered by the Act

Broadly, the Act covers any information that relates to living individuals which is held on computer. This includes information such as name, address, date of birth, ethnicity, and opinions about the individual or any other information from which the individual can be identified. New Era in carrying out its project work will process information relevant to that project eg Education and Training projects will hold information about academic achievement, work history etc.

Processing covered by the Act

The processing of personal information includes obtaining, disclosing, recording, holding, using, erasing or destroying personal information. The definition is very wide and will cover virtually any action which is carried out on computer.

Notification and Registration



New Era Enterprises has made a notification to the Information Commissioner and is Registered with the Information Commissioner to hold and process personal data under 8 purposes. The ICO Registered number is Z74885906. Registration documents and the details for which personal data is held are available for inspection at New Era's offices.

Right of Subject Access and the right to correct information

Individuals have a right under the Act to get a copy of the information held about them on computer and in some manual filing systems. If subject access is requested New Era will respond promptly (According to GDPR Guidance for Co-operatives produced in partnership with Anthony Collins Solicitors - The information should be supplied within 1 month of receiving the request. Where the request is particularly complex then the period may be extended to 2 months) at most within 40 days after the request is received) New Era may ask for any information reasonably required to find the information and check the person's identity. New Era reserves the right to charge a fee for responding to a request which is deemed unreasonable or excessive.

The Act also gives individuals the right to see information that is held about them and to have it corrected if it is wrong.

There are some circumstances, within the scope of the act, when New Era need not supply personal information.

In holding and processing personal information New Era ensures the following.

- 1. The company maintains an up-to-date registration with the ICO.**
- 2. All staff follow the eight data protection principles.**
- 3. Personal information is kept and disposed of securely**
 - keep passwords secure – change regularly, no sharing.
 - lock / log off computers when away from desks.
 - dispose of confidential paper waste securely by shredding.
 - prevent virus attacks by taking care when opening emails and attachments or visiting new websites.
 - work on a 'clear desk' basis - by securely storing hard copy personal information when it is not being used.
 - visitors should be signed in and out of the premises or accompanied in areas normally restricted to staff. No visitors to be left alone in the office.
 - encrypt personal information that is being taken out of the office or sent by email if it would cause damage or distress if lost or stolen.
 - keep back-ups of information.

4. Staff meet the reasonable expectations of customers and employees

- to inform persons the purpose for collection of data, and if this is to be passed on to any third party.
- to collect only the personal information, they need for a business purpose.
- to explain new or changed business purposes to customers and employees, and to obtain consent or provide an opt-out where appropriate.
- to update records promptly – for example, changes of address, marketing preferences.
- to delete personal information the business no longer requires.

5. The disclosure of client personal information over the telephone is limited

- be aware that there are people who will try and trick the company to give out personal information.
- identity checks should be carried out before giving out personal information to someone making an incoming call.
- similar checks should be made when making outgoing calls.
- limit the amount of personal information given out over the telephone and follow up with written confirmation if necessary.

6. Requests from individuals for their personal information is handled in compliance with the Act.

- people have a right to have a copy of the personal information held.
- how to recognise a “subject access request”.
- pass the request to the Admin Key Worker.
- the company has a maximum of 40 days (The information should be supplied within 1 month of receiving the request. Where the request is particularly complex then the period may be extended to 2 months to respond).
- the identity of **for more information and for reference New Era will use the**

ICO publications and website www.ico.gov.uk

For further information see <https://www.gov.uk/data-protection>

*Adopted at the Board Meeting of 10/10/11
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Revised 29/05/18, 28/01/19*



Signature:

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