



LVC Central Ltd

Data Protection Policy

Policy Brief & Purpose

Our company Data Protection Policy refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

Scope

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us.

Who is covered under the Data Protection Policy?

Employees of LVC Central Ltd must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

Policy Elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, financial data etc. Our lawful basis for processing is "Consent" where the individual has given clear consent for us to process their personal data for a specific purpose.

We are committed to ensuring that we comply with the eight data protection principles, as listed below. We shall meet our legal obligations as laid down by the Data Protection Act 1998, ensuring that data is collected and used fairly and lawfully. We shall process personal data only in order to meet our operational needs or fulfill legal requirements and take steps to ensure that personal data is up to date and accurate.

We shall:

- Establish appropriate retention periods for personal data
- Ensure that data subjects' rights can be appropriately exercised
- Provide adequate security measures to protect personal data
- Ensure that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- Ensure that all staff are made aware of good practice in data protection
- Provide adequate training for all staff responsible for personal data
- Ensure that everyone handling personal data knows where to find further guidance

- Ensure that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
- Regularly review data protection procedures and guidelines within our organisation.

Our Eight Data Protection Principles

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall 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.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998.
7. Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall 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.

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

Notification

Our Data protection registration Z8717413

The Information Commissioner maintains a public register of data controllers who process data (information) and who are required to notify their details to the Commissioner. LVC Central Ltd has notified the Information Commissioner of the types of processing we undertake since 1996 and has been placed on the register.

Employment: Code of Practice

LVC Central Ltd will adhere to the Employment Codes of Practice issued by the Information Commissioner on:

- Recruitment and selection
- Employment records
- Monitoring at work

Disciplinary Consequences

All principles described in this policy must be strictly followed by company employees. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

Privacy Notice

We also recommend you read our privacy notice, available on our website or you can request a copy by phone or email.

Changes to our Data Protection Policy

We keep our Data Protection Policy under regular review. It was last updated on 19th April 2018

Signed



Peter Maddox
Director
On behalf of LVC Central Ltd
Date 18th April 2018