**Data Protection Policy**

**What this Policy Covers**

This policy details your rights and obligations in relation to your personal data and the personal data of third parties that you may come into contact with during the course of your employment.

If you have access to the personal data of employees or of third parties, you must comply with this policy. Failure to comply with the policy and procedures may result in disciplinary action up to and including dismissal without notice.

**Employee Entitlements** Personal data means data held either on a computer or in a paper-based filing system which relates to a living individual who can be identified from that data.

The General Data Protection Regulations (GDPR) (2018) prescribes the way in which the company may collect, retain and handle personal data. The company will comply with the requirements of these regulations and all employee and contractors who handle personal data in the course of their work must also comply with it.

**Employee Commencement of Employment** The following initial information will be gathered as part of recruitment of a new employee:

* Emergency contact information *(employee will be asked to confirm that they have the contact person(s) authority for Inex to hold this throughout the life time of the employee’s employment*
* Bank account information
* National Insurance number
* Home address, contact number and personal e-mail address (*e-mail address will be used for payroll/pension purposes only and employee will be asked to sign their consent for Inex to hold this throughout the life time of the employee’s employment)*

**Employee Life Cycle of Employment** The following information will be held on an employee during their employment:

* Disciplinary and grievance documentation
* Performance management and review documentation
* Career Development Reviews (CDR’s)
* Training documentation and certification(s)
* Driving license
* Contract of Employment and subsequent amendments to it
* Absence documentation
* Documentation relating to requests for financial information from institutions such as banks *(employee’s written consent will be obtained prior to any provision)*
* Documentation relating to medical and/or occupational health reports/records *(employee’s written consent will be obtained prior to any requests)*

**Employee Post Employment** On departure from the company, Inex will conduct an exit check, to ascertain whether an employee has provided their written authority for their information to be forwarded to any future companies in the form of a reference. If this is not on file, no such references will be provided.

The following minimum information will be held on an employee following their employment:

* Disciplinary and grievance documentation *(required in the event of any court proceedings being required as evidence)*
* Employee salary/pension information *(required in order to fulfill pension legislative requirements)*
* Documentation relating to the ability to provide references *(if applicable)*
* Documentation relating to training provision of the employee confirming legibility to carry out tasks on behalf of the company

**Sensitive Personal Data** Sensitive personal data includes information relating to the following matters –

* Your racial or ethnic origin;
* Your political opinions;
* Religious or similar beliefs;
* Physical or mental health condition;
* Sexual orientation;
* Commission or alleged commission of any legal offence.

None of the above information will be held at any time by Inex, unless a specific exercise is being carried out by HR in relation to equal opportunities. Any such data would be obtained in conjunction with the prior approval of employees, or on an anonymous basis and be deleted immediately after any such exercise.

**Accuracy of Personal Data** The company will review personal data regularly to ensure that it is accurate, relevant and up to date.

To ensure the company’s files are accurate and up to date, and so that the company is able to contact employees or in the event of an emergency another designated person, employees must notify the company immediately of any changes in personal details. (e.g. name, address, contact numbers, emergency contacts, changes in driving license etc)

**Security of Personal Data** The company will ensure that personal data is not processed unlawfully, lost or damaged. If employees have access to personal data during the course of their employment, they must comply with this obligation. Any employee who believes that they have lost any personal data in the course of work, you must report it to line management immediately. Failure to do so may result in disciplinary action up to and including dismissal without notice. All data held by Inex will be on as strict private & confidential basis.

**Access to Personal Data** The GDPR provides employees with the right to access any personal data held about them by the company, at any given time, via a subject access request. The company will respond to any such request within 30 working days. No charges will be applicable to ny such request.

**Sub-Contractors Data** Sub-Contractors Agreements are issued by Inex upon initial appointment. Inex will hold any such data in conjunction with these. Any sub-contractor wishing to report a breach to their agreement should do so via [dpo@inexworks.co.uk](mailto:dpo@inexworks.co.uk).

**Lead Data** Inex will continue to seek new business via lead sources. Inex will ensure that any third party lead sources are obtained via companies in adherence to GDPR.

Inex will offer all potential leads the opportunity to opt out of further contact by Inex, via reply of initial e-mail. In the instance of a lead choosing to opt out of receiving further contact by Inex, only the minimal data of company/contact name will be held on Inex CRM database, in order that no future contact is made with the lead. This function will act as a reporting mechanism to confirm a list of any such non-leads.

**Customer Data** Inex will ensure adherence to GDPR in relation to data held on all new and existing customers. As such, all data held will be on a minimum and secure basis, with customers’ offered the option of opting out of further contact at point following completion of instructed works.

**Data Protection Officer** Inex appointed Data Protection Officer *(DPO)* is the Director of HR & Compliance. Any breaches reported to the DPO will be registered, investigated, and formally reported to the Information Commissioner’s Office *(ICO)*. Corrective action planning will subsequently be implemented along with any disciplinary actions, as applicable.

**Breaches of Data Protection Policy** Identified breaches to this policy may be formally reported to the DPO via email to [DPO@inexworks.co.uk](mailto:DPO@inexworks.co.uk). Confirmation of receipt will be issued within 3 working days, with associated action implemented within 7 working days.