

AUGHTON AUTOMATION

CONTROL INSTRUMENTATION, ELECTRICAL, MECHANICAL & CIVIL ENGINEERS

GDPR Data Protection Policy

Aughton Automation is committed to conducting its business in accordance with all applicable Data Protection laws and regulations and in accordance with the highest standards of ethical conduct.

This policy sets forth the expected behaviours of Aughton Automation employees, third parties and stake holders in relation to the collection, use, retention, transfer, disclosure and destruction of any Personal Data belonging to an Aughton Automation Data Subject.

Senior Management of Aughton Automation is fully committed to ensuring continued and effective implementation of this policy and expects all employees, third parties and stake holders to share this commitment. Any breaches of this policy will be taken seriously and may result in disciplinary action.

This policy does not form part of any employee's contract of employment and may be amended at any time.

The purpose of this policy is to ensure that Aughton Automation adhere to the following:

- Personal data is processed lawfully, fairly and in a transparent manner
- Personal data is processed in a manner that ensures appropriate security of the personal data, using appropriate technical and organisational measures
- Personal data is kept within a form which permits identification of data subjects for no longer that is necessary for the purpose(s) for which the data is processed
- Personal data is kept up to date (where necessary)
- Personal data collected for specified, explicit and legitimate purposes and not further processes in a manner that is incompatible with those purposes.

Genera Data Protection Regulation (EU 2016/679)

The above regulation has been designed with the intention of strengthening and to unify the Data Protection of all individuals within the European Union (EU). The regulation also addresses the export of Personal Data outside the EU.

These rules apply regardless of whether data is stored electronically or in paper format. To comply with the relevant laws and regulations Aughton Automation stores all personal and sensitive information safely and is used fairly and not disclosed unlawfully.

Scope

This policy applies to all of the organisations interested parties such as, but not limited to; employees, contractors, suppliers and customers.

This policy applies to all processing of personal data in both paper and an electronic form (including electronic mail and documents created with word processing software) or personal data that is held in manual files that are structured in such a way that allows ready access to information about individuals.

This policy will also apply to all personal data Aughton Automation holds relating to identifiable individuals, even if that information technically falls outside of the General Data Protection Regulation (GDPR) this can include the following:

- Names
- Addresses
- Email Addresses
- Telephone Numbers
- Any other information relating to individuals

Integrated Management System - GDPR Data Protection Policy			
IMS AACP 16	Issue 2	Effective Date: 25-05-2018	Revision Date: 25-05-2019

AUGHTON AUTOMATION

CONTROL INSTRUMENTATION, ELECTRICAL, MECHANICAL & CIVIL ENGINEERS

Policy Dissemination & Enforcement

Senior Management must ensure that all Aughton Automation employees responsible for processing personal data are aware of and fully comply with the contents of this policy.

In addition Aughton Automation Senior Management will ensure that all third parties and stake holders engaged within the process of Personal Data on our behalf are fully aware and comply with this policy.

Personal Data

Personal data means that data stored electronically or by paper format relating to a living individual who can be identified directly or indirectly from that particular data or from other data and information in the organisations possession.

Processing is the activity that involves the use of personal data. This includes obtaining, recording or holding the data, organising, amending, retrieving, using, disclosing, erasing, or destroying it. Processing also includes transferring personal data to third parties.

Sensitive data is regarded as data that includes personal data about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric, physical or mental health condition, sexual orientation or details on a person's sexual life. It can also include data about criminal offences or convictions. Sensitive personal data can only be processed under strict conditions, including the clear consent of the individual that the data is associated to.

Data Subject Consent

Aughton Automation will obtain Personal Data by lawful and fair means and where appropriate with the knowledge and consent of the individual concerned.

Aughton Automation will only obtain Personal Data on the following lawful grounds should consent not been sought:

- Contractual Requirements
- Legal Compliance
- Vital Interests
- Legitimate Interests

Where the need exists to request and receive the consent of an individual prior to the collection, use or disclosure of their Personal Data, Aughton Automation is committed to seeking such consent.

Data Protection

Aughton Automation has adopted organisational measures to ensure the security of Personal Data. This includes the prevention of loss or damage, unauthorised alteration, access or processing, and other risks to which it may be exposed by virtue of human action of physical / natural environment.

A summary of Personal Data security measures Aughton Automation adopts are as follows:

- The prevention of un-authorised persons from gaining access to data processing systems in which Personal Data can be accessed
- Ensuring Personal Data is not kept for longer than it is required
- Ensuring that Personal Data in the course of electronic transmission during transport cannot be read, copied, modified or removed without authorisation
- Ensuring that Personal Data is protected against unintended damage or loss

Integrated Management System - GDPR Data Protection Policy			
IMS AACP 16	Issue 2	Effective Date: 25-05-2018	Revision Date: 25-05-2019

AUGHTON AUTOMATION

CONTROL INSTRUMENTATION, ELECTRICAL, MECHANICAL & CIVIL ENGINEERS

Data Storage

For all data stored in a paper format this should be stored in a secure and safe location to prevent access from unauthorised personnel. For any data that is printed and is of a sensitive / private nature must not be left where unauthorised people can access the same.

When no longer required all data must be disposed of securely such as shredded and also disposed of in accordance with the organisations Waste Disposal procedures.

For all data that is stored electronically it is protected from unauthorised access, accidental deletion, and malicious hacking attempts. All electronic data is backed up regularly and removed and stored in a safe, secure location.

The organisation also has approved security software and firewalls to ensure data is protected.

External Privacy Notices

Each external website associated to Aughton Automation shall include both a privacy notice and online cookie notice which fulfils the requirements of applicable law.

Data Subject Requests

Under Article 15 of the General Data Protection Regulation you have the right to obtain from the Data Controller (Aughton Automation) confirmation as to whether or not Personal Data concerning processed and access to the same.

Aughton Automation will establish a system to enable and facilitate the exercise of Data Subject rights to:

- Right of access
- Right to be informed
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object to automated decision making and profiling

All requests received for access to or rectification of Personal Data must be directed to the organisation's Data Controller who will record each request as it is received. A response will be provided within 30 days (or 1 month) of receipt of the written request from the Data Subject.

Appropriate verification will be completed in order to confirm that the requestor is the Data Subject or their authorised legal representative. The Data Subjects shall have the right to require Aughton Automation to correct or supplement erroneous, misleading, outdated or incomplete Personal Data.

If an individual makes a request relating to any of the above listed rights, Aughton Automation will consider each such request in accordance with all applicable Data Protection laws and regulations. No administration fee will be charged for considering / complying with such requests however the organisation reserves the right to charge an administrative fee for any requests that are manifestly unfounded or excessive, particularly if the request is repetitive and for further copies of the same information previously requested.

For any requests that are complex or numerous then the organisation has the right to extend the compliance period for a further two months. Should this be required then the subject will be contacted within the initial month of the subject access request being made.

Please note that the period of compliance starts when the organisation receives the Subject Access Request.

Integrated Management System - GDPR Data Protection Policy			
IMS AACP 16	Issue 2	Effective Date: 25-05-2018	Revision Date: 25-05-2019

AUGHTON AUTOMATION

CONTROL INSTRUMENTATION, ELECTRICAL, MECHANICAL & CIVIL ENGINEERS

When making a Subject Access Request, we require the following:

1. A full written request with details of all information you require from the organisation including:
 - Full name and address
 - Contact telephone number
 - Payroll number / Company ID
 - Details specific to you request

Law Enforcement Request & Disclosures

In certain circumstances, it is permitted that Personal Data be shared without the consent or knowledge of the Data Subject. This applies where the disclosure of the Personal Data is necessary for any of the following purposes:

- The prevention and detection of crime
- By the order of the court or by any rule of law
- The apprehension or prosecution of offenders

Under these circumstances Aughton Automation will disclose the requested data. However the data controller will ensure that the request is legitimate, seeking assistance from Senior Management and seek the relevant legal advice if necessary.



Brian Duffy
25-05-2018
Managing Director

Integrated Management System - GDPR Data Protection Policy			
IMS AACP 16	Issue 2	Effective Date: 25-05-2018	Revision Date: 25-05-2019