

Data Protection Policy



Welcome

USERNAME
Jonathan Doe

PASSWORD

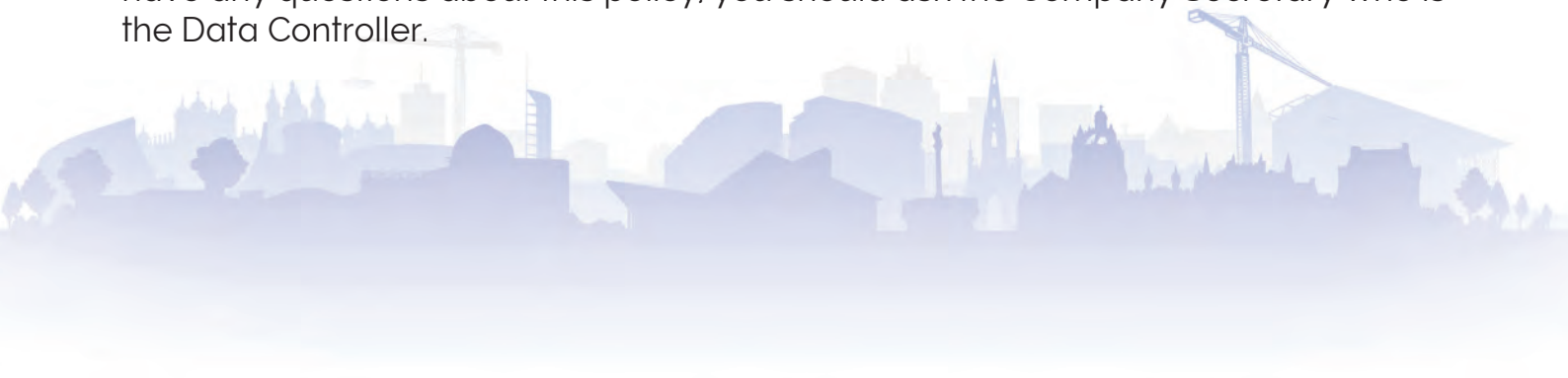
Overall Statement of Principles

In order to achieve our business objectives the Ogilvie Group requires to access data in many different forms. These will include personal data on staff e.g. recruitment, training & development and business purposes.

Staff includes all employees, directors, former employees, potential employees and all contractors, agency staff and other employers' staff working on our premises.

Personal data includes medical information, health & safety, capability for the job, external compliance obligations such as the Financial Services Act and ISO 9001 2000 and other employment and business purposes.

Compliance with the Data Protection Act 1998 is the responsibility of all staff. If you have any questions about this policy, you should ask the Company Secretary who is the Data Controller.



Ogilvie Group is committed to adhering to the Data Protection Act Principles which covers the following areas:

- ▶ Providing information to staff, seeking their agreement to use the information and allowing them access to personal data held on them.
- ▶ Ensuring data is accurate, up to date, relevant, not excessive and not kept for longer than is appropriate.
- ▶ Ensuring security and integrity of computer and manual filing systems against unlawful access and accidental loss or damage to personal data.
- ▶ Ensuring proper confidentiality of personal data is maintained, including strict control over passing information outside the organisation.

Full details on these principles are contained in the Data Protection Act 1998 a copy of which is held by HR.

Statement of Responsibilities

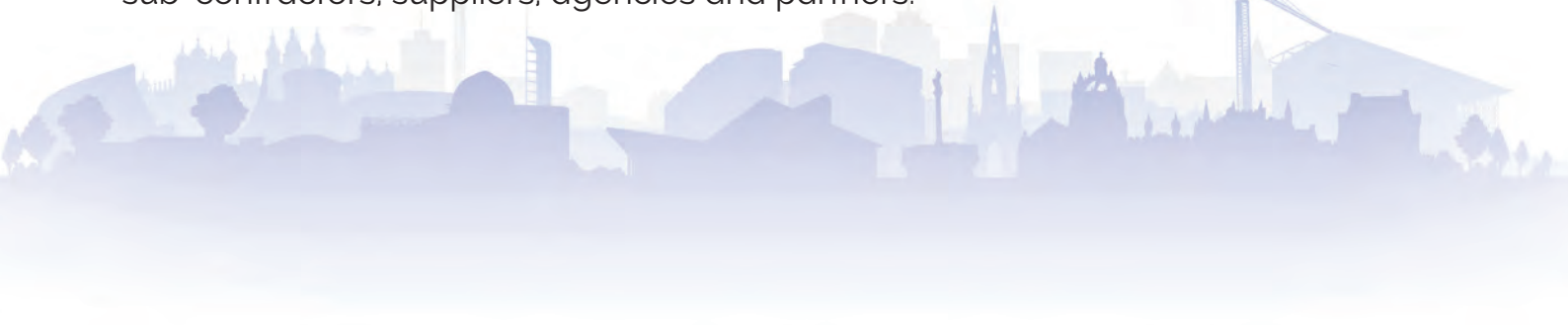
The Data Controller has overall responsibility for the policy, good practice, and compliance with the Data Protection Act and how competencies will be monitored.

Specialist Departments/Functions have responsibilities in the fields of, for example:

- ▶ Interview notes
- ▶ CVs
- ▶ Application forms
- ▶ Test results
- ▶ Copies of qualification records

Departmental/Functional Managers will comply with this policy, in particular their obligations only to hold, obtain, store, organise, adapt, delete, retrieve and disclose data in strict accordance with this policy. Any concerns will be raised with the Data Controller.

Individual Employees must respect the confidentiality of their colleagues personal data received either in the course of their work or inadvertently. They must also respect confidentiality to external organizations for instance, clients, sub-contractors, suppliers, agencies and partners.



The Storage of Personal Data (see attached Data Protection Procedures)

The personal data used within the Ogilvie Group is collected, maintained and stored as follows:

1. Human Resources

- ▶ Interview notes
- ▶ CVs
- ▶ Application forms
- ▶ Test results
- ▶ Copies of qualification records
- ▶ Contractual documents
- ▶ Training and Development records
- ▶ Appraisals, reviews, objectives
- ▶ References received and given by the organization, including credit references.
- ▶ Records concerning disciplinary and grievance investigations and proceedings
- ▶ Transfer, promotion and redeployment records
- ▶ Absence records including holiday, self certificate and medical forms and reports
- ▶ Letters of resignations, redundancies and dismissals

2. Information Technology

- ▶ See IT Policy

3. Health and Safety (including Occupational Health)

- ▶ Accident reports
- ▶ Insurance claims

4. Financial relating to:

- ▶ Payroll & Labour –only Sub-Contractor payments

Access to Personal Data

Additional to access of personal data by company personnel, individuals are entitled to view most of the information the company holds on them for the purpose of determining the accuracy of the data.



An employee is permitted either to request a copy of said file or view the original in the presence of a Manager or Director. This applies to both paper and electronic files.

Personal Data does not extend to all information in which the person making the request is mentioned, for instance, if the individual making the request is not the main focus of the document.

If documents contain confidential personal data on other members of staff, other than the person making a request, the request would not be permitted.

Request Procedure:

- ▶ Staff wishing access to any of their personal data held by the company must complete the appropriate request form (SAR) available from Human Resources.
- ▶ The data will be supplied within one calendar month of the request being received.

Reviewing the Policy

As legislation changes it will be necessary to review this policy and any changes will be communicated to all employees of the Ogilvie Group.

By order of the Board
Ogilvie Group

