



**Rapid Support Services Ltd**

**General Data Protection Policy**

**May 2018**

## Rapid Support Services Ltd

### General Data Protection Policy

#### For Clients

#### **About Us:**

In this privacy policy, reference to “we” “us” or “the Company” is Rapid Support Services Ltd, a limited company incorporated and registered in England (Company No.3012870) at Building A Platinum Business Park, Hall Lane, Lostock, Bolton, England, BL6 4FU.

#### **1 Overview**

- 1.1 Rapid Support Services Ltd (**the Company**) takes the security and privacy of your data seriously. We need to gather and use information or ‘data’ about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the **Data Protection Act 2018** (the ‘2018 Act’) and the **EU General Data Protection Regulation** (‘GDPR’) in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.
- 1.2 The Company is committed to respecting and protecting your privacy. The Company is the data controller of any personal information you provide to us. This means that we are responsible for complying with data protection laws. This means that we determine the purpose and means of the processing of your data. This “Privacy Policy” (**the “Policy”**) explains how we will collect, store and use any personal data you provide to us. This policy applies to prospective, current and former clients.
- 1.3 By providing your personal information to us, you acknowledge that we may use it in the ways set out in this privacy policy.
- 1.4 The Company has measures in place to protect the security of your data in accordance with our Data Security Policy. A copy of this can be obtained from Sandra Crompton.
- 1.5 The Company will hold data in accordance with our Data Retention Policy. A copy of this can be obtained from Sandra Crompton. We will only hold data for as long as necessary and for the purposes for which we collected it.
- 1.6 This policy explains how the Company will hold and process your information. It explains your rights as a data subject. It also explains our obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, the Company.

## 2 How we define personal data

- 2.1 **'Personal data'** means information which relates to a living person who can be **identified** from that data (a **'data subject'**) on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.
- 2.2 This policy applies to all personal data whether it is stored electronically, on paper or on other materials.

## 3. Why we need your details

- 3.1 The Company obtains and uses your personal details to enable us to conduct business with you or on your behalf.

## 4. What personal information do we collect?

- 4.1 We may collect the following none-sensitive information:  
Name, date of birth, email address, business and/or personal phone number  
Business address and/or personal address  
Job title and company name  
Employment history  
Financial information  
Photographic identification  
Health & Safety information, and qualifications & accreditations  
Financial details such as bank account details  
Your signature
- 4.2 We may collect the following sensitive information:  
  
Physical or Mental Health Condition  
Criminal conviction

## 5. How do we collect your personal information?

- 5.1 Face-to-face (directly from you)  
By telephone  
In writing  
By email or other electronic correspondence  
Client events  
Through providing our services

## **6 How we define processing**

6.1 **'Processing'** means any operation which is performed on personal data such as:

- 6.1.1 collection, recording, organisation, structuring or storage;
- 6.1.2 adaption or alteration;
- 6.1.3 retrieval, consultation or use;
- 6.1.4 disclosure by transmission, dissemination or otherwise making available
- 6.1.5 alignment or combination; and
- 6.1.6 restriction, destruction or erasure.

This includes processing personal data which forms part of a filing system and any automated processing.

## **7 How will we process your personal data?**

7.1 The Company will process your personal data (including special categories of personal data) in accordance with our obligations under the 2018 Act.

7.2 We will use your personal data to:

- 7.2.1 Conduct business on your behalf
- 7.2.2 Complying with any legal obligation; or
- 7.2.3 If it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing. See details of your rights in section 12 below.

We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

## **8. Purposes for which we process your sensitive and non-sensitive personal information**

- 8.1 The non-sensitive information supplied to us may be necessary to transact business to which you are party to or in order to take steps at your request prior to transaction.

Processing is necessary for compliance with a legal obligation to which we are subject to and legitimate interests pursued by us or by a third party.

For the processing of sensitive information ie a criminal conviction or health, you will have given your explicit consent to the processing of your sensitive personal information for one or more specified purposes.

## **9 Sharing your personal data**

- 9.1 We may disclose your personal information to the third parties listed below for the purposes described in this privacy policy to carry out our obligations outlined within the Terms of our Business Agreement with you or for our legitimate interests. You can contact the Data Officer (Andrew Crompton) for details of specific disclosures made in respect of your personal information. The third parties listed below will only use your personal information under our strict instruction and are under an obligation to ensure appropriate security measures are in place.

Auditors  
Regulators  
IT Service Providers  
Clients  
Approved Contractor Network

- 9.2 We require those companies to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.
- 9.3 We do not send your personal data outside the European Economic Area. If this changes you will be notified of this and the protections which are in place to protect the security of your data will be explained.

## **10 How we protect your personal information**

We are committed to keeping our personal information secure. We keep your personal information in a secure server and have appropriate security measures in place in our physical facilities

## **11 How to deal with data breaches**

- 11.1 We have robust measures in place to minimise and prevent data breaches from taking place.

You have the right to be notified of a data security breach. If the breach is likely to result in a risk to the rights and freedoms of individuals then we must also notify the Information Commissioner's Office within 72 hours.

- 11.2 If you require a copy of our data breach policy, please contact the Data Protection Officer (Andrew Crompton).

## **12. Your Rights**

- 12.1 Subject to any relevant exemptions, you are entitled to see a copy of the personal information we hold about you (Subject Access Request – SAR) and to request details of how we use your personal information including any disclosures made.

To exercise your rights to access your own personal data, please make your request in writing to the Data Protection Officer (Andrew Crompton). We will respond within one month in writing. If the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.

We take reasonable steps to ensure that the personal information we hold about you is reliable and as accurate and complete as is necessary for its intended use, but you are entitled to ask us to update or amend any inaccuracies in the personal information that we hold about you. To request us to update or amend any personal information we hold about you, please submit this to us in writing. Any information that is found to be incorrect or incomplete will be amended promptly.

There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request.

- 12.2 Under certain conditions, you may also have the right to require us to:

12.2.1 delete any personal information that we no longer have a legal ground to rely on;

12.2.2 object to any processing based on the legal ground of legitimate interests unless our reasons for undertaking that processing outweighs any prejudice to your data protection rights

### **13. Making a Complaint**

- 13.1 In the unlikely event that you have a complaint about the way in which your details are used or stored by us, please contact the Data Protection Officer (Andrew Crompton) in writing.

13.1.1 You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)). This website has further information on your rights and our obligations.