

Data Protection Policy

Policy information	
Organisation	Viessmann Refrigeration Systems Limited
Scope of policy	Policy covers Viessmann Refrigeration Systems Limited
Policy operational date	Policy is reviewed every 3 years
Policy prepared by	Sarah Woodall
Date approved by Board/ Management Committee	22/03/18
Policy review date	22/03/21

Introduction	
Purpose of policy	<p>Viessmann Refrigeration Systems Limited have the policy to:</p> <ul style="list-style-type: none"> • comply with the law • follow good practice • protect clients, staff and other individuals • protect the organisation
Types of data	<p>Customer</p> <ul style="list-style-type: none"> • Credit checks • Addresses • Company details (customer number, VAT number, email address, telephone numbers) <p>Suppliers</p> <ul style="list-style-type: none"> • Addresses • Company details (customer number, VAT number, email address, telephone numbers) • Bank details • Relevant certifications <p>Employees</p> <ul style="list-style-type: none"> • Address • NI • Bank details • Salary details • Certificates • Passport • Driving licence
Policy statement	<p>Viessmann Refrigeration Systems Limited commit to:</p> <ul style="list-style-type: none"> • comply with both the law and good practice • respect individuals' rights • be open and honest with individuals whose data is held • provide training and support for staff who handle personal data, so that they can act confidently and consistently • Notify the Information Commissioner voluntarily, even if this is not required
Key risks	<p>At Viessmann Refrigeration Systems the main risks are:</p> <ul style="list-style-type: none"> • Employee information getting into the wrong hands due to poor security

Responsibilities	
The Board / Company Directors	The Directors have overall responsibility for ensuring that the organisation complies with its legal obligations.
Data Protection Officer	<p>Steve Steadman is the Data Protection Officer. His responsibilities include:</p> <ul style="list-style-type: none"> • Briefing the Board on Data Protection responsibilities • Reviewing Data Protection and related policies • Advising other staff on tricky Data Protection issues • Ensuring that Data Protection induction and training takes place • Notification to the ICO • Handling subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Processors
Employees & Volunteers	All staff and volunteers should be required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work. The policy is held on the shared drive for all employees to read. The policy has been sent to all current employees and have confirmed they have read and acknowledged the content. All new starters will be required to read and acknowledge the content at their induction
Enforcement	<p>Infringements of the Data Protection and related policies will result in a written warning.</p> <p>Training on Data Protection will be held at each team meeting</p>

Security	
Scope	Viessmann Refrigeration Systems Limited ensure that for the data held there is adequate security
Setting security levels	<p>Viessmann Refrigeration Systems Limited ensure the following:</p> <ul style="list-style-type: none"> • All employee data is kept locked in a filing cabinet in a locked office (when unoccupied) • All employee data for SAGE is kept on a local server with only one computer with access • Backups are stored on drives only payroll can access • Supplier and customer data is kept in a locked cabinet in a locked office (when unoccupied) • Supplier and customer data is kept on a local server where only relevant staff can access SAGE
Security measures	<p>Viessmann Refrigeration Systems Limited have the following security measures;</p> <ul style="list-style-type: none"> • password protection • locked screens • clear desk policy • entry control
Business continuity	All data is backed up and held in the cloud including all documents (except employee details) but can only be accessed with passwords and access permissions granted to the relevant employees
Specific risks	<p>Viessmann Refrigeration Systems Limited have the following specific risk:</p> <ul style="list-style-type: none"> • Working from home – mitigated by not taking hard copies home • No data is given out over the phone as we are a small team all individuals are known to each other

Data recording and storage	
Accuracy	<p>Viessmann Refrigeration Systems Limited ensure the accuracy of data by doing the following:</p> <ul style="list-style-type: none"> • checking data taken over the phone by email • employee checking their data entered on to SAGE • telephoning to confirm bank details received by email
Updating	<p>Viessmann Refrigeration Systems check that every 12 months that the data they hold is held within the legal time limits</p>
Storage	<p>Viessmann Refrigeration Systems store data in the following ways:</p> <ul style="list-style-type: none"> • All employee data is kept locked in a filing cabinet in a locked office (when unoccupied) • All employee data for SAGE is kept on a local server with only one computer with access • Backups are stored on drives only payroll can access • Supplier and customer data is kept in a locked cabinet in a locked office (when unoccupied) • Supplier and customer data is kept on a local server where only relevant staff can access SAGE
Retention periods	<p>Viessmann Refrigeration Systems hold the following data for the noted time periods:</p> <ul style="list-style-type: none"> • Customer and supplier details – 6 years • Employee details – 6 years
Archiving	<p>Viessmann Refrigeration Systems Limited archive customer and supplier information every year and it is held in a lock room. After 3 years it is stored in the warehouse and after 6 years it is confidentially shredded by a specialist third party.</p> <p>All employee data is kept locked in a filing cabinet in a locked office (when unoccupied) and after 6 years it is confidentially shredded by a specialist third party.</p>

Right of Access	
Responsibility	At Viessmann Refrigeration Systems Limited Steve Steadman is responsible for ensuring that right of access requests are handled within the legal time limit which is one month
Procedure for making request	Viessmann Refrigeration Systems Limited only accept right of access requests in writing. All employees are responsible for passing on anything which might be a subject access request to the appropriate person without delay.
Provision for verifying identity	Viessmann Refrigeration Systems Limited is a small team and all individuals are known to each other
Charging	Viessmann Refrigeration Systems Limited will provide the information free of charge. However a 'reasonable fee' will be charge when a request is manifestly unfounded or excessive, particularly if it is repetitive. The fee is based on the administrative cost of providing the information.
Procedure for granting access	Viessmann Refrigeration Systems Limited will provide the information electronically if it has been requested in this format

Transparency	
Commitment	<p>Viessmann Refrigeration Systems Limited will inform all customers, suppliers and employees so that they are aware that their data is being processed and</p> <ul style="list-style-type: none"> • for what purpose it is being processed • what types of disclosure are likely, and • how to exercise their rights in relation to the data
Procedure	<p>Viessmann Refrigeration Systems will provide the information in the following ways:</p> <ul style="list-style-type: none"> • Employees – employee handbook and at induction • Customer – in our terms and conditions • Suppliers – on the supplier questionnaire
Responsibility	<p>At Viessmann Refrigeration Systems Limited the following teams are responsible for Data transparency:</p> <ul style="list-style-type: none"> • Operations team • Finance team

Lawful Basis	
Underlying principles	<p>Viessmann Refrigeration Systems Limited has a lawful basis for holding the following data:</p> <ul style="list-style-type: none"> • Employees – Necessary to process salaries • Customer – Necessary to invoice for receipt of goods or services • Suppliers – Necessary to process invoices and payments for goods and services provided
Opting out	<p>Viessmann Refrigeration Systems Limited requires the information for processing necessary transactions and therefore opting out is not appropriate</p>
Withdrawing consent	<p>Viessmann Refrigeration Systems Limited acknowledges that consent can be withdrawn but not retrospectively. This is with the exception of legal requirement to hold data for 6 years</p>

Employee training & Acceptance of responsibilities	
Induction	Viessmann Refrigeration Systems Limited will ensure that as part for the inductions all employees will have their responsibilities outlined
Continuing training	Training on Data Protection will be held at each team meeting
Procedure for staff signifying acceptance of policy	All staff and volunteers should be required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work. The policy is held on the shared drive for all employees to read. The policy has been sent to all current employees and have confirmed they have read and acknowledged the content. All new starters will be required to read and acknowledge the content at their induction

Policy review	
Responsibility	Steve Steadman is responsible for carrying out the next policy review
Procedure	The review will involve all employees as part of the team meeting with particular focus on the Operations Team and the Finance Team
Timing	Policy review will need to be started in January 2021 to ensure it is completed by March 2021
