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Established in 1972, Freeland Freight Services Ltd provides 24/7 logistics solutions locally, nationally and internationally that includes heavy lifters, craneage and transport.

Freeland Freight Services Ltd is required to keep certain personal information, for example staff details, and contractual information to fulfil its purpose and to meet its legal obligations. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, the company must comply with the guidelines set out in the **General Data Protection Regulations**.

PRINCIPLES

Personal data shall:

- be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose
- be adequate, relevant and not excessive for those purposes
- be accurate and kept up to date
- not be kept for longer than is necessary for that purpose
- be kept secure from unauthorised access, accidental loss or destruction
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.


The company, and all staff who process or use personal information, must ensure that they follow these principles at all times. To ensure that this happens, the Company has developed this Data Protection / Privacy Policy.

Full details of the Organisation’s approach to data retention, including retention periods for specific personal data types held by the Organisation are appended in **APPENDIX 1**.

STATUS OF THE POLICY

This policy has been approved by the company and any breach will be taken seriously and may result in more formal action.

Any member of staff who considers that the policy has not been followed in respect of personal data about themselves should raise the matter with their line manager, in the first instance.

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NOTIFICATION OF DATA HELD AND PROCESSED

All staff are entitled to: -

- ask what information the company holds about them, and why
- ask how to gain access to it
- request consent from the company to keep and maintain any person information held
- on leaving the company seek assurances that any information held about them is destroyed (right to be forgotten) within the prescribed timeframe (see **APPENDIX 1**)
- be informed how to keep it up to date
- be informed what the company is doing to comply with its obligations under the **General Data Protection Regulations**.

RESPONSIBILITIES OF STAFF

All staff are responsible for: -

- checking that any personal data they provide to the company is accurate and up to date
- informing the company of any changes to data which they have already provided, e.g. change of address
- checking the accuracy of any data that they may have to send out on behalf of the company from time to time


If, as part of their work responsibilities, staff collect information about other people (e.g. personal circumstances regarding members of staff in their department), they must comply with this Policy and with the Data Protection Guidance Notes.

DATA SECURITY

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted. All staff are responsible for ensuring that:

- any personal data which they hold is kept securely
- personal information is not disclosed verbally, in writing or in any other way to any unauthorised third party.

Detailed advice on data security is contained in the Data Protection Guidance Notes.

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RIGHTS TO ACCESS INFORMATION

Employees of the company have the right to access any personal data that is being kept about them, regardless of whether it is held on computer systems or is paper-based. Any person who wishes to exercise this right should make the request in writing to the company.

The company aims to comply with requests for access to personal information as quickly as possible but will ensure that it is provided **within 40 days** of receipt of a request, unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

PUBLICATION OF COMPANY INFORMATION

Information that is already in the public domain is exempt from the **General Data Protection Regulations**. This would include, for example, information on staff contained within externally circulated publications. Any individual who has good reason for wishing details in such publications to remain confidential should contact the company.

SUBJECT CONSENT

The need to process data for normal purposes has been communicated to all staff. In some cases, if the data is sensitive - for example information about health, race or gender, etc. - express consent to process the data must be obtained. Processing of the data may be necessary to comply with other company policies, such as health and safety and equal opportunities.

RETENTION OF DATA


It is a requirement that the Company must keep some forms of information for longer than others. The company has a Records Retention Schedule as outlined in **APPENDIX1**.

Signed: 

Position: DIRECTOR


Date: 18th January 2018

A signed copy of this document is available for inspection upon request.


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APPENDIX 1

Document Type	Activity Type	Retention Period*
Records documenting the organisation's governance arrangements.	Records documenting information that defines the governance arrangements of the organisation e.g. <ul style="list-style-type: none"> Articles of association Constitution 	permanent
Records documenting the organisation's relationships and responsibilities to statutory bodies and in meeting its legal responsibilities.	Records documenting information that: <ul style="list-style-type: none"> The organisation is legally obliged to provide to the funding and statutory bodies Underpin the organisation's arrangements in meeting legislative requirements (e.g. health and safety strategies / equality and diversity policies) 	permanent
Records documenting the organisations strategic and corporate plans and those defining relationships with trade unions where they are recognised.	All corporate / strategic level documents e.g. <ul style="list-style-type: none"> Strategic Plan Risk / Performance Management Plans Agreements with Trade Unions Details of Funding Allocations 	TBD then destroy
Records documenting the organisation's regulations and policies.	Records documenting the establishment of all key policies and regulations, including those related to staff, e.g. <ul style="list-style-type: none"> Regulations HR Policies 	TBD then destroy
Personal data	Records containing staff personal data e.g. <ul style="list-style-type: none"> Address NI number 	Duration of employment plus 6 years then destroy

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Document Type	Activity Type	Retention Period*
Personal sensitive data	Records containing staff sensitive personal data e.g. <ul style="list-style-type: none"> Age Ethnicity Gender Religion Disability 	Duration of employment plus 6 years
Records documenting the handling of enquiries/complaints	Records documenting enquiries, complaints and requests from individuals/organisations, e.g. <ul style="list-style-type: none"> Freedom of Information requests Subject access requests Customer complaints 	TBD then destroy
Records documenting relationships with collaborative partners.	Records relating to co-operative partnerships and collaborative arrangements with other organisations.	TBD then destroy
Records documenting the organisation's financial management arrangements.	Records detailing organisation accounts, payroll handling, procurement, tax arrangements, investments, insurance management etc.	End of current financial year + 6 years, then destroy
Records documenting the review, analysis, monitoring and performance of operations.	Records documenting the establishment and use of activities used to monitor the impact or measure the performance of particular activity, e.g. <ul style="list-style-type: none"> Customer Satisfaction Surveys Performance Management Reviews Retention analysis <p>Note: If data not anonymised then it must meet the requirements set-out under GDPR.</p>	TBD then destroy

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Document Type	Activity Type	Retention Period*
Records documenting the handling of non-statutory communications with those external to the organisation.	Records documenting general communications with those external to the organisation and the internal handling of related responses, e.g. <ul style="list-style-type: none"> • Press release • Marketing campaigns 	TBD then destroy
Records documenting the planning and completion of specifically defined activities, and the completion of day-to-day administrative tasks.	Non-strategic / non-sensitive administrative information (i.e. not required to be retained for external reporting purposes) documenting the design, organisation, operation and summary results of a specific set of activities for a defined end point: <ul style="list-style-type: none"> • Induction Programmes • Attendance /absence information 	TBD then destroy
Records documenting the handling of enquiries made by individuals/organisations external to the organisation (non-statutory).	Records documenting enquiries, complaints and requests from individuals/organisations. For example: <ul style="list-style-type: none"> • Reference requests 	TBD then destroy.