

# General Data Protection Regulations Policy

## Purpose

To ensure that Pendersons complies with the requirements of the General Data Protection Regulations.

## Scope

This policy applies to all Pendersons staff, subcontractors and learners to prevent the unauthorised or unlawful processing or disclosure of personal data.

## Procedure

Employees and learners may be required to give certain information relating to them in order that Pendersons may properly carry out its duties, rights and obligations as an employer and training provider. Pendersons will process and control such data principally for personnel, administrative and payroll purposes.

The term "processing" may include Pendersons obtaining, recording or holding the information or data or carrying out any set of operation or operations on the information or data, including organising, altering, retrieving, consulting, using, disclosing or destroying the information or data. Pendersons will adopt appropriate technical and organisational measures to prevent the unauthorised or unlawful processing or disclosure of data.

Employees and learners are requested to sign the consent form, PO2F06, giving consent to Pendersons to process personal data relating to them which may include sensitive personal data. Personal information will be used for internal HR and Business administration duties only. Personal information will not be shared with third parties unless additionally agreed with the employee/learner. For learners working towards a vocational qualification photographic evidence may need to be obtained and held as part of an evidence base for their qualification. Any images used by the company for promotion and marketing will require the express permission of the persons involved.

"Personal data" means data which relates to a living individual who can be identified-

- (a) From those data, or
- (b) From those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,

and includes any expression of opinion about the individual and any indication of the intentions of HR or any other person in respect of the individual.

"Sensitive Personal data" means personal data consisting of information as to-

- (a) The racial or ethnic origin of the data subject (the Employee or Learner),
- (b) The subject's political opinions,
- (c) The subject's religious beliefs or other beliefs of a similar nature,

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- (d) Whether the subject is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
- (e) The subject's physical or mental health or condition,
- (f) The subject's sexual life,
- (g) The commission or alleged commission by the subject of any offence, or
- (h) Any proceedings for any offence committed or alleged to have been committed by the subject, the disposal of such proceedings or the sentence of any court in such proceedings.

All personal and sensitive data will be kept securely in accordance with GDPR Rules.

Data Protection Officer is Joanne Moulton

Any requests for data must be made to [j.moulton@pendersons.com](mailto:j.moulton@pendersons.com) and any personal or sensitive data held will be provided within 28 days. There will be no charge for this.

For further information please see <http://www.pendersons.com/page/privacy-cookies-policy>

The Director can be contacted by sending an email to –

[info@pendersons.com](mailto:info@pendersons.com)



**Mark Pender**  
**Company Director**

Review due by 25th May 2021

Pendersons Limited are registered with the Information Commissioners Office under registration reference Z3431407.