

1. About this Document

- 1.1 During our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about our staff and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 1998 (**DPA**). The purpose of this notice is to make you aware of how we will handle your personal data.
- 1.2 This notice does not form part of any employee's contract of employment, and we may amend it at any time.

2. Data Protection Principles

- 2.1 We will comply with the following data protection principles in the DPA, which say that personal data must be:
 - used fairly, lawfully and transparently
 - used for specified, explicit purposes
 - used in a way that is adequate, relevant and limited to only what is necessary
 - accurate and, where necessary, kept up to date
 - kept for no longer than is necessary
 - handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage
- 2.2 "Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

3. Fair and Lawful Processing

- 3.1 We will usually only process your personal data where you have given your consent or where the processing is necessary to comply with our legal obligations. In other cases, processing may be necessary for the protection of your vital interests, for our legitimate interests or the legitimate interests of others. The full list of conditions is set out in the DPA.
- 3.2 We will only process "sensitive personal data" about ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sex life, criminal proceedings or convictions, where a further condition is also met. Usually this will mean that you have given your explicit consent, or that the processing is legally required for employment purposes. The full list of conditions is set out in the DPA.

4. How We Are Likely to Use Your Personal Data

- 4.1 We will process data about staff for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations as an employer, for example to pay you, monitor your performance and to confer benefits in connection with your employment.
- 4.2 We may process sensitive personal data relating to staff including, as appropriate:
 - information about an employee's physical or mental health or condition to monitor sick leave and take decisions as to the employee's fitness for work;
 - the employee's racial or ethnic origin or religious or similar information to monitor compliance with equal opportunities legislation;
 - To comply with legal requirements and obligations to third parties.

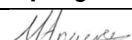
5. Processing for Limited Purposes

- 5.1 We will only process your personal data for the specific purpose or purposes notified to you or for any other purposes specifically permitted by the DPA.

6. Adequate, Relevant and Non-excessive Processing

- 6.1 Your personal data will only be processed to the extent that it is necessary for the specific purposes notified to you.

7. Accurate Data

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Authorised Signature:	

7.1 We will keep the personal data we store about you accurate and up to date. Data that is inaccurate or out of date will be destroyed. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data, we hold about you.

8. Data Retention

8.1 We will not keep your personal data for longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems when it is no longer required.

9. Processing in Line with Your Rights

9.1 You have the right to:

Request access to any personal data we hold about you.

Prevent the processing of your data for direct-marketing purposes.

Ask to have inaccurate data held about you amended.

Prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.

Object to any decision that significantly affects you being taken solely by a computer or other automated process.

10. Data Security

10.1 We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

10.2 We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if they agree to comply with those procedures and policies, or if they put in place adequate measures himself.

10.3 Maintaining data security means guaranteeing the confidentiality, integrity, and availability (for authorised purposes) of the personal data.

11. Providing Information to Third Parties

We will not disclose your personal data to a third party without your consent unless we are satisfied that they are legally entitled to the data. Where we do disclose your personal data to a third party, we will have regard to the following data protection principles,

12. Subject Access Requests

12.1 If you wish to know what personal data we hold about you, you must make the request in writing. All such written requests should be directed to the Data Protection Officer.

13. Breaches of Data Protection Principles

13.1 If you consider that the data protection principles have not been followed in respect of personal data about yourself or others, you should raise the matter the Data Protection Officer. Any breach of the DPA will be taken seriously and may result in disciplinary action.

The Data Protection Officer is Jayne Booth – Jayne.booth@ekspan.com

Signed:



Max Angerer – Director

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