

Data Protection Policy

Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

We are committed to:

- ensuring that we comply with the eight data protection principles, as listed below
- meeting our legal obligations
- ensuring that data is collected and used fairly and lawfully
- processing personal data only in order to meet our operational needs or fulfil legal requirements
- taking steps to ensure that personal data is up to date and accurate
- establishing appropriate retention periods for personal data
- ensuring that data subjects' rights can be appropriately exercised
- providing adequate security measures to protect personal data
- ensuring that all staff are made aware of good practice in data protection
- providing adequate training for all staff responsible for personal data
- ensuring that everyone handling personal data knows where to find further guidance
- ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
- regularly reviewing data protection procedures and guidelines within the organisation.

Principles

1. Personal data shall be processed fairly, lawfully and in a transparent manner.
2. Personal data shall be obtained for one or more specified and legitimate purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be processed only where it is adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date and all reasonable steps will be taken to ensure that inaccurate personal data is rectified or deleted without delay
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the General Data Protection Regulations (GDPR).
7. Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Responsibility for data protection compliance

Clay Cartwright is responsible for data protection compliance and can be contacted at c.cartwright@euro-sprint.co.uk. Any questions about this policy or requests for further information should be directed to him.

Individual rights

Individuals have a number of rights in relation to their personal data.

Subject access requests

Individuals have the right to make a subject access request. If an individual makes a subject access request, we will tell him/her:

- Whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- To whom his/her data is or may be disclosed, including to recipients located outside the European economic area (eea) and the safeguards that apply to such transfers;
- For how long his/her personal data is stored (or how that period is decided);
- His/her rights to rectification or erasure of data, or to restrict or object to processing;
- His/her right to complain to the information commissioner if he/she thinks the organisation has failed to comply with his/her data protection rights; and
- Whether or not the organisation carries out automated decision-making and the logic involved in any such decision-making.

The company will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

To make a subject access request, the individual should send the request to c.cartwright@euro-sprint.co.uk. In some cases, the organisation may need to ask for proof of identification before the request can be processed. The company will inform the individual if it needs to verify his/her identity and the documents it requires.

The company will normally respond to a request within a period of one month from the date it is received. In some cases, such as where the company processes large amounts of the individual's data, it may respond within three months of the date the request is received. The company will write to the individual within one month of receiving the original request to tell him/her if this is the case.

If a subject access request is manifestly unfounded or excessive, the company is not obliged to comply with it. Alternatively, the company can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the company has already responded. If an individual submits a request that is unfounded or excessive, the company will notify him/her that this is the case and whether or not it will respond to it.

Other rights

Individuals have a number of other rights in relation to their personal data. They can require the company to:

- Rectify inaccurate data;
- Stop processing or erase data that is no longer necessary for the purposes of processing;
- Stop processing or erase data if the individual's interests override the company's legitimate grounds for processing data (where the company relies on its legitimate interests as a reason for processing data);
- Stop processing or erase data if processing is unlawful; and

- Stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override the organisation's legitimate grounds for processing data.

To ask the company to take any of these steps, the individual should send the request to c.cartwright@euro-sprint.co.uk

Data Breaches

If we discover that there has been a breach personal data that poses a risk to the rights and freedoms of individuals, we will report it to the Information Commissioner within 72 hours of discovery. The company will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

Individual responsibilities

Individuals are responsible for helping the company keep their personal data up to date.

Individuals should let the company know if data provided to the company changes

Individuals may have access to the personal data of other individuals and of our customers and clients in the course of their employment. Where this is the case, the company relies on individuals to help meet its data protection obligations to staff [and to customers and clients].

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the organisation) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the organisation's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;
- not to store personal data on local drives or on personal devices that are used for work purposes; and
- to report data breaches of which they become aware to Clay Cartwright immediately.