

**GDPR POLICY**

**General Statement of KMS Duties and Scope**

KMS is required to process relevant personal data regarding members of staff, applicants and customers as part of its operation and shall take all reasonable steps to do so in accordance with this Policy. KMS will ensure that all personal data is processed in compliance with The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) adopted 27 April 2016 and is actively working towards compliance with that directive. This policy shall be used in conjunction with the Approved User Policy and the Privacy Notice.

**The Principles**

KMS shall so far as is reasonably practicable comply with the GDPR Regulations to ensure all data is:

* Fairly and lawfully processed
* Processed for a lawful purpose
* Adequate, relevant and not excessive
* Accurate and up to date
* Not kept for longer than necessary
* Processed in accordance with the data subject's rights
* Secure
* Not transferred to other countries without adequate protection

**Processing of Personal Data**

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent. KMS processes some personal data for direct marketing purposes, data subjects have the right to request an opt-out to these activities, which must be respected.

**Sensitive Personal Data**

KMS may, from time to time, be required to process sensitive personal data. Sensitive personal data includes data relating to medical information, trade union membership, criminal records and proceedings.

**Accuracy**

KMS will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

**Enforcement**

KMS will take disciplinary action against any individual(s) who knowingly and wantonly breach the GDPR Policy. Any loss/ breach of data will be reported to the Data Security Manager (DCM) who shall report to the Information Commissioner’s Office (ICO).

**Data Security**

KMS will take appropriate technical and organisational steps to ensure the security of personal data. All staff will be made aware of this policy and their duties under the Act. KMS staff are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data.

**External Processors**

KMS will ensure that data processed by external processors, for example, service providers, Cloud services including storage, web sites etc. are compliant with this policy and the relevant legislation.

**Secure Destruction**

When data held in accordance with this policy is destroyed, it will be destroyed securely in accordance with best practice at the time of destruction.

**Retention of Data**

KMS may retain data for differing periods of time for different purposes as required by statute or best practices, individual departments incorporate these retention times into the processes and manuals. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data. KMS may store some data such as Health and Safety and other data indefinitely in its archive to comply with legislation.

**CCTV**

KMS owns and operates a CCTV network for the purposes of crime prevention and detection and safeguarding.

Where a data subject can be identified, images will be processed as personal data.

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| **DATE** | **RESPONSIBLE PERSON** | **SUMMARY OF REVIEW** |
| 9th May 2018 | EDDIE HARRIS | POLICY WRITTEN - VERSION 1 |
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Eddie Harris

Compliance Manager

Dated 9th May 2018