

## KAY PILSBURY THOMAS ARCHITECTS GDPR POLICY

### Purpose

This company respects individuals' rights of privacy and of protection of personal data. The company also recognizes the necessity of open and frank communication and of the collection of personal and sensitive personal data in order to accomplish its business activity, as well as the corresponding necessity to maintain confidentiality and ensure that information is adequately protected.

### Operational Principles

This company handles all personal data in accordance with the following principles:

1. Personal data will be processed in a fair and lawful manner.
2. Personal data will be collected, processed, and used only to the extent necessary to fulfil the business purposes of the organization. Personal data will be accurate and kept up-to-date. Any error will be corrected as soon as possible after the religious organization becomes aware of it.
3. Personal data will be kept only for as long as is necessary for the legitimate purpose(s) of this business.
4. Due consideration will be given to respecting the rights of data subjects.
5. Appropriate technical and organizational measures will be taken to prevent unauthorized or unlawful disclosure of personal data. All computer-held personal data is maintained on password-protected computers to which only authorized users hold passwords. Offices are locked after office hours, and only authorized staff may gain entry.
6. Personal data will not be transferred to other organizations unless this is necessary to accomplish its business purposes.

### Scope

Personal data will be used by this business organization to achieve its business objectives.

### Rights of Data Subjects

Whenever we process personal data, we take reasonable steps to ensure that personal data is kept accurate and up-to-date for the purposes for which it was collected. A data subject has the following rights regarding the personal data submitted to us:

- They can request information about the collection and use of their personal information;
- They can request to access, correct, erase, or block your personal information if it is incomplete or inaccurate;

- Where they have legitimate grounds for doing so, they can object to the processing of their personal information and request us not to process it any further.

If a data subject wishes to carry out any of the above, they should contact the company Data Controller.

Upon receipt of a written request, after the provision of sufficient evidence of identity, and enough information to permit us to identify their personal data, the data controller will fairly consider granting the request by balancing the interests of the individual in gaining access to data or correcting or deleting data against the legitimate interests of the business, including whether granting the request would endanger the organization's right to carry on its business. We will also notify any third-party recipients of the necessary changes.

Personal data may not be erased if processing is required by law or if the data may be kept for another legal basis. Requests to delete personal data are subject to any applicable legal reporting or document retention requirements imposed on us. You may also lodge a complaint with your local data protection authority about the processing of the personal data provided to us.

#### Performance

This company will abide by the requirements of the current data protection regulations in communicating with data subjects regarding their personal data; including taking steps to make sure it remains accurate.

#### Basis

The Data Protection Law in this country is: The Data Protection Act 2018

#### USE of PERSONAL DATA

##### Source

Your personal data may have been obtained from yourself, agencies for example employment agencies.

##### Definition

What is personal data?

##### Our Usage of Personal Data

Personal data is used for or in conjunction with the following activities;

- Employment including references, right to work, qualifications, training, payroll, discipline, health and safety;
- Paying sub-contractors;
- Paying suppliers;
- Entering into contracts for supply of materials and/or labour;
- Transacting other business processes e.g. enquiries, quotations, purchasing, communications etc;
- Providing instructions for the carrying out of these activities;

These activities have a lawful basis which includes a legal obligation upon us, the obligation to perform a contractual obligation, and the legitimate interests of the business.

#### Principles for processing personal data

This company handles all personal data in accordance with the following principles:

1. Personal data will be processed in a fair and lawful manner.
  - You will be informed of the manner in which your personal data is processed upon either being employed by the company or transacting with it for a business activity;
2. Personal data will be collected, processed, and used only to the extent necessary to fulfil the business purposes of the organization.
  - Personal data is held on variety of media including paper and electronically; storage methods are secured to authorized persons only who have been trained in the principles of personal data protection;
3. Personal data will be accurate and kept up-to-date. Any error will be corrected as soon as possible after the organization becomes aware of it.
  - You may inform us of data which needs correcting, or we may become aware of an inaccuracy in which case we will conform this with you;
4. Personal data will be kept only for as long as is necessary for the legitimate purpose(s) of this business.
  - We have identified the retention period of personal data taking into consideration the legal requirements of such; these are summarised at the end of this document. Any variation will be notified to you if and when this becomes needed.
5. Due consideration will be given to respecting the rights of data subjects.
  - We will fairly consider granting the request of your rights by balancing the interests of the individual granting their right against the legitimate interests of the business,
6. Appropriate technical and organizational measures will be taken to prevent unauthorized or unlawful disclosure of personal data. All computer-held personal data is maintained on password-

protected computers to which only authorized users hold passwords. Offices are locked after office hours, and only authorized staff may gain entry.

- Periodically these measures will be subject to inspection and audit to ensure we remain compliant with these regulations.

7. Personal data will not be transferred to other organizations unless this is necessary to accomplish its business purposes.

- If we need to transfer your personal data, this will be made known to you before this action occurs.

#### Consent

Your consent is one legal base to our holding your personal data; you have the right to withdraw that consent. We will explain to you the implications of such withdrawal of consent at that time since the implications will vary according to the circumstances. This applies even if you have already given us consent to hold and process your personal data.

#### Your Rights Concerning Personal Data

Individuals have the following rights under the GDPR in relation to the personal data we hold on you:

- 1) the right to be informed about the data we hold on you and what we do with it;
  - a) we will supply information to you which is:
    - b) concise,
    - c) transparent,
    - d) intelligible and easily accessible;
    - e) written in clear and plain language, particularly if addressed to a child; and
    - f) free of charge.
- 2) the right of access to the data we hold on you.
  - a) confirmation that their data is being processed;
  - b) access to their personal data; and
  - c) other supplementary information
- 3) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
  - a) Individuals are entitled to have personal data rectified if it is inaccurate or incomplete.

4) the right to have data deleted in certain circumstances. This is also known as 'erasure'. The right to erasure does not provide an absolute 'right to be forgotten'. Individuals have a right to have:

- a) personal data erased and to prevent processing in specific circumstances:
- b) Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- c) When the individual withdraws consent.
- d) When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
- e) The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
- f) The personal data has to be erased in order to comply with a legal obligation.

5) the right to restrict the processing of the data;

- a) You will be required to restrict the processing of personal data in the following circumstances:
- b) Where an individual contests the accuracy of the personal data, you should restrict the processing until you have verified the accuracy of the personal data.
- c) Where an individual has objected to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and you are considering whether your organisation's legitimate grounds override those of the individual.
- d) When processing is unlawful and the individual opposes erasure and requests restriction instead.
- e) If you no longer need the personal data but the individual requires the data to establish, exercise or defend a legal claim.

6) the right to transfer the data we hold on you to another party. This is also known as 'portability';

- a) The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
- b) It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

7) the right to object to the inclusion of any information; this means that Individuals have the right to object to:

- a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);

- b) direct marketing (including profiling); and
  - c) processing for purposes of scientific/historical research and statistics.
- 8) the right to regulate any automated decision-making and profiling of personal data.

We do not use any automated decision-making process;

Employees and Temporary staff

#### NOTICE and CONSENT for the USE of PERSONAL DATA

Upon becoming an employee of Kay Pilsbury Thomas Architects, I acknowledge that the company lawfully uses my personal data in accordance with its legitimate business interests and operations.

Additionally, I consent to the use of my personal data so that I may participate in the activities of the company in connection with my employment. I understand that I have a number of 'rights' in relation to my personal data and that I can exercise these rights by contacting the company's data controller on 01799 599208 . I also agree that my personal data may be sent to other selected organizations for the purpose of maintaining my employment, and that some of these organizations may be situated in countries whose laws may provide different levels of data protection that are not always equivalent to the level of protection provided by the law of the United Kingdom.

I have been informed about and had the opportunity to read the Use of Personal Data document and available to me as a hard copy upon request. I consent to the use of my personal data as stated in that document and as it may be amended from time to time.

Signature:

Print Name:

Date:



Sibyl Thomas

22.05.23