

Data Protection Policy – **EXTERNAL USE**

1. **Introduction**

Quitie Limited process and hold significant amounts of personal data, from information on employees to contractors' and clients' personnel. This information is collected from a variety of sources, including the individual themselves, either directly or through their use of our website including submission of e-forms. Third parties including our clients and suppliers may also provide us with details of their personnel.

This policy details Quitie Limited stance regarding how data must be collected, handled and stored to meet the company's data protection standards and to comply with the law.

2. **Scope**

Territory

As an organisation, our policy is based upon the General Data Protection Regulations (2016/679) (GDPR) and the UK's Data Protection Act however; each entity must always comply with any applicable local legislation relating to personal data.

In countries where there is no law or the law does not meet the standards set out by the rules in this document, we will process personal information adhering to the rules in this document.

Definition of Personal Data

This shall mean all data that the company holds which is relatable to an identifiable individual.

3. **Responsibilities**

Everyone who works for Quitie Limited is responsible for ensuring that Personal Data is collected, stored and handled correctly.

Quitie Limited board of directors hold ultimate responsibility for ensuring that Quitie Limited meets its legal obligations.

4. **Principals**

This policy is underpinned by 6 key principals which are shared in common with GDPR. These are that all Personal Data must be:

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1) *processed lawfully, fairly and in a transparent manner;*

Quitie Limited will tell individuals what processing will occur (transparency), and the processing will match the description given to the individual (fairness) and will be for a purpose specified in the applicable data protection law, where applicable, (lawful).

2) *collected for specified, explicit and legitimate purposes*

Quitie Limited will not process Personal Data for a purpose other than has been specified

3) *adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,*

Quitie Limited will only process Personal Data where it is necessary for the specified purpose.

4) *accurate and where necessary, kept up to date and where possible, erased or rectified without delay;*

Quitie Limited will make all individuals aware of their duty to keep the company up to date with regards their personal details. Quitie Limited will maintain accurate records and, where permitted by law, shall erase personal data when requested to do so by the relevant individual.

5) *stored for no longer than is necessary ;*

Quitie Limited has in place policies regarding the retention of Personal Data to ensure that data retention terms align with local laws.

6) *processed in a manner that ensures appropriate security of personal data;*

Quitie Limited has policies in place which address the secure storage and transfer of Personal Data.

5. Data Collection

Quitie Limited will only collect Personal Data from an individual if one of the following apply:

- The nature of the business purpose necessitates collection of the Personal Data from other persons or bodies.
- The collection must be carried out under emergency circumstances in order to protect the vital interests of the individual or to prevent serious loss or injury to another person.

If it is determined that notification to an individual is required, notification should occur promptly.

6. Data Storage

Quitie Limited shall use appropriate measures to safely store all Personal Data, taking into account the nature of the data. Everyone who works for Quitie Limited must comply with any applicable policies.

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7. Data Transfer

Quitie Limited shall use all appropriate measures to ensure that all transfers of personal data are carried out securely, taking into account the nature of the data.

Where our service providers or customers have access to any Personal Data we control, we must impose contractual obligations dealing with the security of that information to ensure that 3rd parties provide the right level of protection.

Everyone who works for Quitie Limited must comply with any applicable policies.

8. Data Breach Management Policy

Quitie Limited has appropriate measures in place to ensure that any data breach is managed appropriately and where necessary reported to the relevant Authority.

9. Data Retention Policy

Quitie Limited has appropriate measures in place to ensure Personal Data records are maintained for no longer than is necessary. Everyone who works for Quitie Limited must comply with any applicable policies.

10. Special Categories of Data

Quitie Limited has appropriate measures in place to ensure that special categories of data are handled appropriately. Everyone who works for Quitie Limited must comply with any applicable policies.

11. Subject Access Requests

Quitie Limited has appropriate measures in place to ensure that subject access requests are handled appropriately. Everyone who works for Quitie Limited must comply with any applicable policies.

12. Further Information

Further details of the policies referred to within this document are available upon request from the Managing Director.

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