

MCS Control Systems

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Data Privacy and Protection Policy

This policy is part of the MCS Code of Ethics and is to be read in conjunction with our Security Measures & Risk Management Policy. This policy is practised throughout our organisation from recruitment, through selection, training, promotion, discipline and dismissal. At no stage in the past has the company or any of its Directors or employees been guilty of any breached relating to data protection.

General

The Data Privacy and Protection Policy has been produced to comply with the General Data Protection Regulations, which came into force on 25th May 2018.

MCS Control Systems is the Data Controller and Data Processor for the purposes of this policy.

Employees of our company must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or act on our behalf and may need occasional access to data.

Scope

The policy applies to all offices which MCS is responsible for and refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us.

Responsibilities

- The Board of Directors will have overall responsibility for ensuring that MCS complies with its legal obligations.
- A named senior member of the Management team is the Data Co-ordinator.
- The IT Manager is responsible for Electronic Security.
- The Group Support Manager is responsible for approving Data-Protection-related statements on publicity materials, letters, etc.
- Department Managers must ensure that the Data Co-ordinator is informed of any changes in their uses of personal data that might affect the organisation's Notification.
- All employees are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Policy Brief & Purpose

Our Policy refers to our commitment to comply with the law and follow good practice and to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality, with a view to both protect their interests and those of our own organisation.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

We will be open and honest with individuals whose data is held, provide training and support for staff who handle personal data, so that they can act confidently and consistently.

Key Risks

We have identified the main risks within our organisation in two key areas:

- Information about individuals getting into the wrong hands, through poor security or inappropriate disclosure of information.
- Individuals being harmed through data being inaccurate or insufficient.

Policy Elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, national insurance numbers, financial data etc.

MCS collects this information in a transparent way and only with the full cooperation, knowledge and consent of interested parties.

Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorised or illegal access by internal or external parties

Our data will not be:

- Communicated informally
- Stored for more than a specified amount of time
- Transferred to organisations or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs.

Specifically we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

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Actions

To exercise data protection we are committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation etc.)

Our data protection provisions will appear on our website.

Breaches in Policy

All principles described in this policy must be strictly followed.

Any breaches to this policy will be investigated and could result in disciplinary action and possible revocation/reduction in access rights, termination of employment and/or criminal investigation of any individuals.

MCS reserves the right to contact any of our stakeholders, such as employees, clients or suppliers etc, and the necessary authorities, including the Information Commissioners' Office, if there are any breaches to this policy.

This policy will be kept up to date, the policy and the way in which it has operated, is reviewed every year.

Signed:



Name: Stephen Poole **Position:** Group Managing Director

This Policy Statement will only be signed on the original copy (available upon request)

Date Issued: 29/01/18 **Review Date:** 03/01/19