

# Global Instrumentation Ltd Trading as Global Associates

## DATA PROTECTION

In the course of business Global needs to collect and use certain types of information about its employees and clients. This personal information must be collected and dealt with appropriately, whether it is collected in paper, stored in a computer database or recorded on other material, and there are safeguards under the Data Protection Act 1998 to ensure this happens.

Also, in the course of your work you may come into contact with and use confidential information about people, such as names and addresses or even information about client circumstances, families, health and other private matters. This policy helps you ensure you do not breach the Data Protection Act 1998, which has strict rules in this area.

If you are in any doubt about what you may or may not do, seek advice from a Company Director. If you can't get hold of the advice you need, do not disclose the information concerned.

The Company holds personal data about you, and in your employment contract you have consented to the data being used. If this information changes, you should let us know so that our records can be updated.

If you access another employee's records without authority, this will be treated as gross misconduct and is a criminal offence.

The Chief Executive has been designated as the Data Protection Compliance Officer

### A. DATA PROTECTION PRINCIPLES

The Data Protection Act 1998 requires that eight data protection principles be followed in the handling of personal data. These are that personal data must:

- be fairly and lawfully processed
- be processed for limited purposes and not in any manner incompatible with those purposes
- be adequate, relevant and not excessive
- be accurate
- not be kept for longer than is necessary
- be processed in accordance with the individuals' rights
- be secure
- not be transferred to countries without adequate protection

### B. PERSONAL INFORMATION & SENSITIVE DATA

The definition of 'personal information' is any information about an employee which enables them to be identified, e.g. name and address.

The definition of 'sensitive data' refers to data about the following:

- race or ethnic origin
- political affiliations
- religion or similar beliefs
- Trade Union membership
- physical or mental health
- sexuality
- criminal record, including any proceedings
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### C. PROCESSING OF DATA

'Processing' means collecting, amending, handling, storing or disclosing personal information. Global will, through appropriate management and strict application of criteria and controls:

- observe and adhere to conditions regarding the collection and use of information
- meet legal obligations to specify the purposes for which information is used
- collect and process appropriate information, and only to the extent that the information is needed to fulfil operational needs or to comply with legal requirements
- ensure the quality of information used
- uphold the applicable employee rights (see below)
- take appropriate technical and organisational security measures to safeguard personal information
- set out clear procedures for responding to requests for information
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#### **D. DATA STORAGE**

Employee information will be stored securely and will only be accessible to authorised staff. Employee files will be kept in locked cabinets in an office kept locked overnight, and electronic personal data will be stored securely and not placed on the server (unless in a secure, designated area with appropriate password protection).

Information will only be stored for as long as it is needed or in accordance with the retention periods recommended by the Information Commissioner (who is responsible for implementing and overseeing the Data Protection Act in the UK).

#### **E. EMPLOYEE RIGHTS**

Global will uphold the rights of employees on whom information is held, including:

- the right to be informed that processing is being undertaken
- the right to access one's personal information
- the right to prevent processing in certain circumstances
- the right to correct, rectify, block or erase information which is incorrect

#### **F. DATA ACCESS**

All employees have the right to access any information held about them by the Company. Global will also take periodic steps to ensure that the information held is up to date by asking employees whether there have been any changes to the data held.

#### **G. DISCLOSURE**

Global may share data with other organisations when necessary e.g. under the Transfer of Undertakings (Protection of Employment) Regulations 1981. Employees will be made aware how and with whom their information will be shared.

However, there are circumstances where the law allows organisations to disclose data (including sensitive data) without the employee's consent, and these are as follows:

1. Carrying out a legal duty or as authorised by the Secretary of State
2. Protecting vital interests of an employee, client or other third party
3. When the employee has already made the information public
4. Conducting any legal proceedings, obtaining legal advice or defending any legal rights
5. Monitoring for equal opportunities purposes, i.e. race, disability or religion

#### **H. REQUESTING INFORMATION**

You have the right to write to ask for details of any personal data held on computer or in your personal file, and to be told why that data is being held.

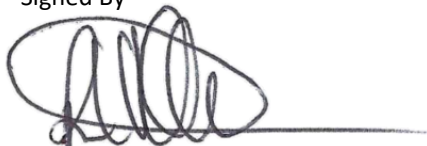
You also have the right to be provided with hard copies of all such data, although the Company is not obliged to provide the actual original document.

Under the Data Protection Act Global does not need to comply with a request for information if doing so would disclose information relating to another employee who could then be identified from that information, or as the source of that information, unless that other employee has consented to the disclosure or it is reasonable in the circumstances to provide that information without their consent.

Global has 40 days to respond to an employee's request for information concerning personal data. The Company is entitled to request any further information reasonably required to confirm the identity of the employee making the request, and to locate the information requested.

If an external request for information is received, for example from a client, which could identify an individual employee, then the employee's permission will be sought before any information is released.

Signed By



Paul Wetherfield  
Chief Executive Officer Global  
Associates

Dated: 2nd January 2025