



DATA PROTECTION POLICY



GENERAL DATA PROTECTION POLICY



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1.0 Goal of the data protection policy

The goal of the data protection policy is to depict the legal data protection aspects in one summarising document. It can also be used as the basis for statutory data protection inspections, e.g. by the customer within the scope of commissioned processing. This is not only to ensure compliance with the European General Data Protection Regulation (GDPR) but also to provide proof of compliance.

In addition, CCP Building Products Ltd will:

- Complying with the law
- Following good practice
- Protecting clients, staff and other individuals

2.0 Introduction

As we approach May 2018, CCP Building Products Ltd is focused on its GDPR compliance responsibilities. During the implementation period, we are evaluating new requirements and restrictions imposed by GDPR and will take any action necessary to ensure that we handle all data in compliance with the applicable law. CCP will undertake a review of all supplier and third-party contracts and arrangements to ensure that all our partners continue to apply the same high standards of data protection.

CCP Building Products Ltd will:

- Comply with both the law and good practice
- Respect individuals' rights
- 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
- Notify the Information Commissioner voluntarily, even if this is not required



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3.0 Security policy and responsibilities in the company

- In addition to existing corporate objectives, the highest data protection goals are to be defined and documented. Data protection goals are based on data protection principles and must be individually modified for every company.
- Determination of roles and responsibilities (e.g. representatives of the company, operational data protection officers, coordinators or data protection team and operational managers)
- Commitment to continuous improvement of a data protection management system
- Training, sensitisation and obligation of the employees

4.0 Legal framework in the company

- Industry-specific legal or conduct regulations for handling personal data
- Requirements of internal and external parties
- Applicable laws, possibly with special local regulations

5.0 Documentation

- Conducted internal and external inspections completed by the Data Protection Officer
- Data protection need: determination of protection need about confidentiality, integrity and availability. Existing technical and organisational measures (TOM)

CCP Building Products Ltd will follow all GDPR guidelines.

Examples of such guidelines include:

- Guideline for the rights of data subjects
- Access control
- Information classification (and handling thereof)
- Physical and environmental-related security for end users such as:
 - Permissible use of values
 - Guideline for information transfer based on the work environment and screen locks
 - Mobile devices and telecommuting
 - Restriction of software installation and use
- Data backup
- Information transfer
- Protection against malware
- Handling technical weak points
- Cryptographic measures
- Communication security
- Privacy and protection of personal information
- Supplier relationships: Noting regular inspection and evaluation of data processing, especially the efficacy of the implemented technical and organisational measures.



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6.0 Employee Declaration

(**Name**) will fully comply with the Data Protection Act 1998 and Data Protection principles, which state that information must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with individual's rights
- Kept secure
- Not transferred without adequate protection

(**Name**) recognise that the above principles relate to both paper and electronic systems of record keeping.

CCP or third-party information will not be disclosed to any other party, unless with specific permission of the person it relates to. Any person may request that their details are removed from our records at any time. Any person may request a copy of their information at any time.

Personal Information may not be e-mailed under any circumstances and will be held on a system with encrypted access.

Personnel, client and customer information may only be held by named members of CCP Building Products or staff who have signed this form.

I agree to abide to the principles and rules of this policy.

Signed -----

Position-----

Date-----



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Process Owner:	Tony Hartley-Jones - SHEQ Manager
Authority:	Paul Blanchard – Managing Director
Author:	Tony Hartley-Jones - SHEQ Manager
Reference:	CCP4-1-B Data Protection Policy
Revision:	1
Date:	May 2018