

DATA PROTECTION POLICY & PRIVACY NOTICE

SECTION ONE – DATA PROTECTION POLICY

Ethicheck, Registered Company 09183490
Unit 4a, Blacknest Ind. Est., Bentley, Hants, GU34 4PX.

Ethicheck is a medical refrigeration and monitoring company that services the UK, Europe and the world.

For any queries regarding the content of this Policy Document and Privacy Notice, or any requests to access data held, please contact Kevin Duck, 01372 236455, kevin@ethicheck.eu

Understanding our Obligations

Ethicheck have assessed and documented all processing activities conducted regularly, those exposing data to a high-risk and any sensitive personal data. These activities have been justified using the Legal Bases and Special Conditions provided in the Regulations and written into a Privacy Notice, please see Section Two of this document. The Privacy Notice is also available to all Interested Parties on our website, ethicheck.eu

Data Subject Access Rights

Individuals have the right to request details of any personal information that Ethicheck may hold on you, and you have increased rights regarding our use of that information, including;

- The right to request rectification of information that is inaccurate or out of date
- The right to erasure of your information (also known as “the right to be forgotten”)
- The right to restrict the way in which we are dealing with and using your information
- The right to request that your information be provided to you in a format that is secure and suitable for re-use (also known as “the right to portability”)

Ethicheck acknowledges that any person may ask if any information is held containing their personal data. Ethicheck will respond to written requests as soon as possible, not taking any longer than 30 days to provide copies of any data held. The company shall correct any errors if requested, and agrees to delete records where this is permitted under the Legal Basis.

Review of Data Protection Policy and Privacy Notice

Data Protection is a standing agenda item at the Ethicheck Management Review Meeting; this includes a review of the Data Protection Impact Assessment and Privacy Notice for relevance and accuracy. The documents, and this policy document, shall be reviewed in full at least annually.

Security Details

Every effort is made to manage the personal information held by Ethicheck in a responsible and secure manner. To this end, all network equipment is encrypted and password protected. The servers are located on-site and are backed up to the Cloud. Staff using mobile phones to access business information, including emails, are asked to add PIN or Fingerprint security, and ensure that the operating system updates are downloaded when available. Track my phone apps are downloaded on company mobiles to delete data remotely if necessary.

Hard copy information for clients and personnel is kept in a locked cabinet; the office premises are locked and alarmed with a system that is remotely monitored.

Breach Response

In the event of a breach, such as a break-in, loss or theft of a laptop or phone, all staff and clients will be made aware. If there is a serious risk of personal data being misused, then all contacts will be informed and the incident reported to the Information Commissioner's Office within three days of the breach being discovered; Ethicheck will then take guidance on further action from the ICO.

SECTION TWO – PRIVACY NOTICE

Processing Activity Statements

Activity

Purpose/justification – *Legal Basis / Special Condition*

Customer Information

Order History

Customer files are held on the OneDrive and backed up to the Cloud – *Contract*

Service Contracts

Customer details are sent to third-party contractor Network Catering Engineers for service contracts sold as part of extended warranty conditions – *Contract*

Delivery

For the purposes of device delivery, a third-party courier is used – *Contract*

General Contacts

Outlook Address Book of Contact Information for Businesses

Business contacts from networking and referrals for the promotion of Ethicheck – *Legitimate Interests*

CRM for B2B Marketing

Lead Generation databases purchased in the pursuit of contract opportunities – *Legitimate Interests*

Website

Cookies are text files generated by the website and stored on the user's computer partly for marketing purposes and Lead Generation – *Legitimate Interests*

Business

Accreditation

Evidence of Ethicheck's activities and responsible persons are provided in the application and audit process for certification to ISO 9001– *Legitimate Interests*

Software

XERO

Bookkeeping software contains client contact information and invoicing records. Recorded here for transparency as the servers for this programme are based in the USA – *Contract*

MATOS

MATOS fridge monitoring system alerts users to variance in device temperatures and any other faults. Usernames and contact email addresses are held in the system. Recorded here for transparency as the servers for this programme are based in NZ – *Contract*

Staff

Absence Monitoring and Appraisals

To monitor performance, sickness and holiday absences – *Legitimate Interests*

Third Party Payroll

Payroll is managed by a third party, Stedman & Co., as the resource for this isn't yet available internally – *Legitimate Interests / Special Condition B Legal Compliance*

Employment Records

Retention of application form and contract, copies of identification and qualifications where applicable – *Legal Obligation / Special Condition B Legal Compliance*

DBS Checks

Checks conducted and copies retained for all staff & volunteers working with vulnerable people and children – *Legal Obligation / Special Condition B Legal Compliance*

Accident Records

Retention of workplace accident records – *Legal Obligation / Special Condition B Legal Compliance*