

This data protection policy sets out our commitment to protecting data and how we implement that commitment with regards to the collection and use of personal data.

This is a statement of the data protection policy adopted by Works MC. Responsibility for the updating and dissemination of the policy rests with the Works MC's Information Protection Officer. The policy is subject to regular review to reflect, for example, changes to legislation. All Works MC staff and contractors are expected to apply the policy and to seek advice when required.

Works MC needs to collect and use certain types of information about people with whom it deals in order to operate. These include Works MC's own employees, suppliers, clients and others with whom Works MC and our clients conduct business.

We regard the lawful and correct treatment of personal information by Works MC as important to the achievement of our objectives and to the success of our operation, and to maintaining confidence between those with whom we deal and ourselves. We therefore need to ensure that our organisation treats personal information lawfully and correctly.

To this end we are committed to:

- Ensuring that we comply with the eight data protection principles as listed below.
- Meeting our legal obligations as laid down by the Data Protection Act 1998.
- Ensuring that data is collected and used fairly and lawfully.
- Processing personal data only in order to meet our operational needs or fulfill legal requirements.
- Taking steps to ensure that personal data is up to date and accurate.

- Establishing appropriate retention periods for personal data.
- Ensuring that data subjects' rights can be appropriately exercised.
- Providing adequate security measures to protect personal data.
- Ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues.
- Ensuring that all staff are made aware of good practice in data protection.
- Providing adequate training for all staff responsible for personal data.
- Ensuring that everyone handling personal data knows where to find further guidance.
- Ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly.
- Regularly reviewing data protection procedures and guidelines within the organisation.

Data protection principles:

- Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;
- Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- Personal data shall be accurate and, where necessary, kept up to date;

- Personal data shall not be kept for longer than is necessary for the specified purpose(s);
- Personal data shall be processed in accordance with the rights of data subjects under the Act;
- Personal data should be subject to appropriate technical and organisational measures to prevent the unauthorised or unlawful processing of personal data, or the accidental loss, destruction or damage to personal data;
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Chris Cloughley
Managing Director

