

WCF Ltd - Data Protection Policy Statement

Updated: October 2017

Date of next review: November 2018

Introduction

In order to run our business we collect information about the people with whom we work. These are known as 'data subjects' and may include shareholders, directors, employees, customers or suppliers, both current, past and prospective.

This personal information is handled according to the requirements of the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR"), the Privacy and Electronic Communications Regulations ("PECR") and all related UK regulations (collectively known as "DP Laws") in the course of complying with our obligations as an employer and/or dealing with issues arising from the provision of goods and services to the public. The Act gives certain rights to people whose 'personal data' we may hold.

We consider that the secure and ethical treatment of personal data is integral to our successful operations and to maintaining the trust of the persons we deal with.

WCF Ltd is registered with the Information Commissioner to process personal data and is named as the Data Controller under the register kept by the Information Commissioner.

WCF Ltd have detailed data and privacy policies for all its data subjects.

Information covered by DP Laws

The Act uses the term 'personal data' which essentially means any recorded information held by us and from which a living individual can be identified. It will include a variety of information including names, billing and delivery addresses, telephone numbers, e-mail addresses and other personal details.

Data Protection Obligations

WCF is committed to processing personal data in compliance with the Principles below and to demonstrating such compliance. The fundamental "Principles" relating to the processing of personal data are that it should be:

- (i) processed fairly and lawfully and in a transparent manner;
- (ii) obtained only for specified, explicit and legitimate purposes and not used for other purposes;
- (iii) adequate, relevant and limited to what is necessary for the purpose for which it is processed;
- (iv) accurate, kept up to date and, where it is inaccurate, erased or rectified without delay;
- (v) kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which that personal data is being processed;
- (vi) processed in a manner that ensures appropriate security, including protection against unauthorised and against accidental loss, destruction or damage;
- (vii) processed in accordance with the rights of data subjects under the GDPR; and

- (viii) not be transferred outside of the EEA except where specific conditions are met.

Lawful Basis

WCF relies on one of the following as the legal basis on which it processes personal data:

- (i) Where it is necessary for the performance of our contract;
- (ii) Where it is necessary for compliance with our legal obligations;
- (iii) Where it is necessary for the purposes of WCF's legitimate business interests; and in some cases
- (iv) Where the data subject has given their consent for the processing of their personal data

Sensitive Personal Data

Some of the Employee Data we hold and use falls into what are known under DP Laws as "special categories" of data. These types of data are more sensitive data. "Special categories" of data include a person's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offence.

In processing the "special categories" of personal data we may hold, WCF relies on the following lawful bases:

- (i) the employee's explicit consent;
- (ii) processing is necessary for us to carry out our obligations or exercise specific rights in employment as authorised by UK law;
- (iii) processing is necessary for the defence of legal, unfair dismissal, health and safety and employer liability insurance claims;
- (iv) processing is necessary in the public interest; or
- (v) processing is necessary to protect an employee's or other's vital interests

Individuals' Rights

Data subjects have other rights under Data Protection Laws in relation to their personal data. This includes:

- (i) the right to request that we rectify or erase information held about them without undue delay ("right to be forgotten");
- (ii) the right to ask us to limit the processing of this information;
- (iii) the right (if we are processing information based on consent, such as for marketing purposes) to withdraw such consent;
- (iv) the right to object to certain processing of personal information (including the right to object to processing of personal data for direct marketing purposes at any time); and
- (v) the right to obtain and re-use their data (i.e. ask us to move, copy or transfer it to another organisation).

Subject Access Requests

All data subjects have the right at any time to request to see personal information held about them either digitally or on file. All such requests must be in writing and should be forwarded immediately to our Company Secretary Pam Murray at Crawhall, Brampton, Cumbria, CA8 1TN or pam.murray@wcf.co.uk. We have 30 working days to respond to the request and provide data subjects with a copy of all the personal information we hold about them.

Our Commitment

We are committed to taking all reasonable steps and measures to ensure that:

- We always comply with DP Laws and follow good practice;
- We protect the rights of all data subjects whose personal data we hold;
- We are open about how we capture, process and retain personal data;
- We protect ourselves against the risk of a data breach;
- The personal data we hold is accurate and up to date and any inaccurate data is rectified or erased;
- We do not hold personal data for any longer than is necessary for the purposes for which it was obtained;
- Ensuring that our employees understand the contents of our data policies and their contribution to compliance with the requirements of the DP Laws;
- The Company Secretary is assigned day to day responsibility for the implementation of our data policies;
- Colleagues who handle personal data are appropriately trained to ensure that they remain up to date with the requirements of the DP Laws;
- We carry out due diligence on our third-party data processors to verify that they have appropriate technical and organisational measures to protect our personal data;
- Subject access requests are promptly and courteously dealt with;
- We take all necessary steps to ensure that personal data is secured and processed in a way that ensures protection against unauthorised or unlawful processing or against accidental, destruction or damage;
- We do not transfer any personal data outside the European Economic Area ("EEA") without the appropriate safeguards; and
- We will carry out regular reviews of our data policies



Jo L Ritzema
Managing Director

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