

QUALITY SYSTEM MANAGEMENT SYSTEM

SECTION: COMPANY STATEMENTS
TITLE: DATA PROTECTION

PROCEDURE No. 602
DATE OF ISSUE: 20/2/15
ISSUE No. 3
REVIEW DATE 1/12/2020

1 PURPOSE

This policy defines how Cable Services Limited as a company sees its responsibility's in view of data protection.

2 SCOPE

This procedure is applicable to all Cable Services Limited branches, employees, and systems.

3 REFERENCES

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679))

**4 DETAILS OF PROCEDURE
RESPONSIBILITIES**

The implementation of this procedure is mandatory at all branches.

Cable Services Limited's Privacy Notice (Procedure 602 appendix 1) states the personal data the company collects and the parameters of how it is processed. The Data Inventory (Procedure 602 appendix 2) show the Personal Data Cable Services processes and the time scales held for.

Anyone saving data must abide by the rules laid down in the General Data Protection Regulation. Personal data must be only collected/processed if: -

(i) Consent: the individual has given clear consent for you to process their personal data for a specific purpose or...

(ii) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(iii) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(iv) Vital interests: the processing is necessary to protect someone's life.

(v) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(vi) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

5 SUBJECT ACCESS REQUESTS

Individuals whose information is held by Cable Services Limited have the right to ask for a subject access request. Cable Services Limited must respond within 30 days, subject to being satisfied that the request

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is genuine. Cable Services Limited must respond to the individual with a report on the information held on them.

Individuals can also request that data the Cable Services Limited holds, which the individual deems to be inaccurate is corrected.

When considering a SAR

- Is it a subject access request; i.e. could the individual be requesting just one particular piece of information.
- Ensure the subject is who they say they are.
- Acknowledge receipt of the request.
- Information cannot be edited or changed prior to returning it to the individual.
- Ensure any information does not refer to or identify other individuals – redact if necessary.
- Cable Services must then provide the data to the subject in a permanent form (unless the individual has agreed to an electronic format)