



05 Data Protection Policy 2021



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Introduction

This Policy sets out the obligations of, **Rapidfix Ceilings and Partitions Ltd** registered in United Kingdom under number **09866962**, whose registered office is at **8 Castlegate, Tickhill, Doncaster, England, DN11 9QU** regarding data protection and the rights of **Employees and customers** in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets **Rapidfix Ceilings and Partitions Ltd** obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must always be followed by **Rapidfix Ceilings and Partitions Ltd**, its employees, agents, contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd**.

The **Rapidfix Ceilings and Partitions Ltd** is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

1. The Data Protection Principles

This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

Processed lawfully, fairly, and in a transparent manner in relation to the data subject.

Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes.

Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.

Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the





GDPR to safeguard the rights and freedoms of the data subject.

Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

2. **The Rights of Data Subjects**

The GDPR sets out the following rights applicable to data subjects (please refer to the parts of this policy indicated for further details):

The right to be informed (Part 12).

The right of access (Part 13);

The right to rectification (Part 14);

The right to erasure (also known as the 'right to be forgotten') (Part 15);

The right to restrict processing (Part 16);

The right to data portability (Part 17);

The right to object (Part 18); and

Rights with respect to automated decision-making and profiling (Parts 19 and 20).

3. **Lawful, Fair, and Transparent Data Processing**

The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:

The data subject has given consent to the processing of their personal data for one or more specific purposes;

The processing is necessary for the performance of a contract to which the data subject is a party, or to take steps at the request of the data subject prior to entering into a contract with them;

The processing is necessary for compliance with a legal obligation to which the data controller is subject;

The processing is necessary to protect the vital interests of the data subject or of another natural person;

The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or

The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental





rights and freedoms of the data subject which require protection of personal data, where the data subject is a child.

The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so);

The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law (insofar as it is authorised by EU or EU Member State law or a collective agreement pursuant to EU Member State law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);

The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;

The processing relates to personal data which is clearly made public by the data subject;

The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;

The processing is necessary for substantial public interest reasons, based on EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;

The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;

The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of EU or EU Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or

The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.





4. **Specified, Explicit, and Legitimate Purposes**

Rapidfix Ceilings and Partitions Ltd collects and processes the personal data set out in Part 21 of this Policy. This includes:

Personal data collected directly from data subjects and Personal data obtained from third parties.

Rapidfix Ceilings and Partitions Ltd only collects, processes, and holds personal data for the specific purposes set out in Part 21 of this Policy (or for other purposes expressly permitted by the GDPR).

Data subjects are kept informed always of the purpose or purposes for which **Rapidfix Ceilings and Partitions Ltd** uses their personal data. Please refer to Part 12 for more information on keeping data subjects informed.

5. **Adequate, Relevant, and Limited Data Processing**

Rapidfix Ceilings and Partitions Ltd will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed) as under Part 5, above, and as set out in Part 21, below.

6. **Accuracy of Data and Keeping Data Up to Date**

Rapidfix Ceilings and Partitions Ltd shall ensure that all personal data collected, processed, and held by it is kept accurate and up to date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 14, below.

The accuracy of personal data shall be checked when it is collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

7. **Data Retention**

Rapidfix Ceilings and Partitions Ltd shall not keep personal data for any longer than is necessary considering the purpose or purposes for which that personal data was originally collected, held, and processed.

When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

For full details of **Rapidfix Ceilings and Partitions Ltd** approach to data retention, including retention periods for specific personal data types held by the, please refer to our Data Retention Policy.

8. **Secure Processing**

Rapidfix Ceilings and Partitions Ltd shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and





against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in Parts 22 to 27 of this Policy.

9. Accountability and Record-Keeping

Rapidfix Ceilings and Partitions Ltd Data Protection Officer is **Dan Elwell**.

The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, other **Rapidfix Ceilings and Partitions Ltd** data protection-related policies, and with the GDPR and other applicable data protection legislation.

Rapidfix Ceilings and Partitions Ltd shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

The name and details of **Rapidfix Ceilings and Partitions Ltd**, its Data Protection Officer, and any applicable third-party data processors;

The purposes for which **Rapidfix Ceilings and Partitions Ltd** collects, holds, and processes personal data;

Details of the categories of personal data collected, held, and processed by **Rapidfix Ceilings and Partitions Ltd**, and the categories of data subject to which that personal data relates;

Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;

Details of how long personal data will be retained by **Rapidfix Ceilings and Partitions Ltd** (please refer to **Rapidfix Ceilings and Partitions Ltd** Data Retention Policy); and

Detailed descriptions of all technical and organisational measures taken by **Rapidfix Ceilings and Partitions Ltd** to ensure the security of personal data.

10. Data Protection Impact Assessments

Rapidfix Ceilings and Partitions Ltd shall carry out Data Protection Impact Assessments for all new projects and/or new uses of personal data.

Data Protection Impact Assessments shall be overseen by the Data Protection Officer and shall address the following:

The type(s) of personal data that will be collected, held, and processed;

The purpose(s) for which personal data is to be used;

Rapidfix Ceilings and Partitions Ltd objectives;

How personal data is to be used;

The parties (internal and/or external) who are to be consulted;

The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;





Risks posed to data subjects;

Risks posed both within and to **Rapidfix Ceilings and Partitions Ltd**; and

Proposed measures to minimise and handle identified risks.

11. **Keeping Data Subjects Informed**

Rapidfix Ceilings and Partitions Ltd shall provide the information set out in **Part 11b** to every data subject:

11a - Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and
Where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:

If the personal data is used to communicate with the data subject, when the first communication is made; or

If the personal data is to be transferred to another party, before that transfer is made; or

As soon as reasonably possible and in any event not more than one month after the personal data is obtained.

The following information shall be provided:

11b -Details of **Rapidfix Ceilings and Partitions Ltd** including, but not limited to, the identity of its Data Protection Officer;

The purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 21 of this Policy) and the legal basis justifying that collection and processing;

Where applicable, the legitimate interests upon which **Rapidfix Ceilings and Partitions Ltd** is justifying its collection and processing of the personal data;

Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;

Where the personal data is to be transferred to one or more third parties, details of those parties;

Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the “EEA”), details of that transfer, including but not limited to the safeguards in place (see Part 28 of this Policy for further details);

Details of data retention;

Details of the data subject’s rights under the GDPR;

Details of the data subject’s right to withdraw their consent to **Rapidfix Ceilings and Partitions Ltd** processing of their personal data at any time;

Details of the data subject’s right to complain to the Information Commissioner’s Office (the “supervisory authority” under the GDPR);

Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it; and





Details of any automated decision-making or profiling that will take place using the personal data, including information on how decisions will be made, the significance of those decisions, and any consequences.

12. **Data Subject Access**

Data subjects may make subject access requests (“SARs”) at any time to find out more about the personal data which **Rapidfix Ceilings and Partitions Ltd** holds about them, what it is doing with that personal data, and why.

Employees wishing to make a SAR should do using a Subject Access Request Form, sending the form to **Rapidfix Ceilings and Partitions Ltd** Data Protection Officer at **Dan Elwell**.

Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.

All SARs received shall be handled by **Rapidfix Ceilings and Partitions Ltd** Data Protection Officer.

Rapidfix Ceilings and Partitions Ltd does not charge a fee for the handling of normal SARs. **Rapidfix Ceilings and Partitions Ltd** reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

For further information about SAR see Appendix 1

13. **Rectification of Personal Data**

Data subjects have the right to require the **Rapidfix Ceilings and Partitions Ltd** to rectify any of their personal data that is inaccurate or incomplete.

The **Rapidfix Ceilings and Partitions Ltd** shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the **Rapidfix Ceilings and Partitions Ltd** of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

If any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

14. **Erasure of Personal Data**

Data subjects have the right to request that **Rapidfix Ceilings and Partitions Ltd** erases the personal data it holds about them in the following circumstances:





It is no longer necessary for **Rapidfix Ceilings and Partitions Ltd** to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;

The data subject wishes to withdraw their consent to **Rapidfix Ceilings and Partitions Ltd** holding and processing their personal data;

The data subject objects to **Rapidfix Ceilings and Partitions Ltd** holding and processing their personal data (and there is no overriding legitimate interest to allow **Rapidfix Ceilings and Partitions Ltd** to continue doing so) (see Part 18 of this Policy for further details concerning the right to object);

The personal data has been processed unlawfully;

The personal data needs to be erased for **Rapidfix Ceilings and Partitions Ltd** to comply.

Unless **Rapidfix Ceilings and Partitions Ltd** has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

If any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

15. **Restriction of Personal Data Processing**

Data subjects may request that **Rapidfix Ceilings and Partitions Ltd** ceases processing the personal data it holds about them. If a data subject makes such a request, **Rapidfix Ceilings and Partitions Ltd** shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.

If any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

16. **Data Portability**

Rapidfix Ceilings and Partitions Ltd processes personal data using automated means.

Where data subjects have given their consent to **Rapidfix Ceilings and Partitions Ltd** to process their personal data in such a manner, or the processing is otherwise required for the performance of a contract between **Rapidfix Ceilings and Partitions Ltd** and the data subject, data subjects have the right, under the GDPR, to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers).

To facilitate the right of data portability, **Rapidfix Ceilings and Partitions Ltd** shall make available all applicable personal data to data.

Where technically feasible, if requested by a data subject, personal data shall be sent directly to the required data controller.





All requests for copies of personal data shall be complied with within one month of the data subject's request. The period can be extended by up to two months in the case of complex or numerous requests.

17. **Objections to Personal Data Processing**

Data subjects have the right to object to **Rapidfix Ceilings and Partitions Ltd** processing their personal data based on legitimate interests and/or direct marketing (including profiling).

Where a data subject objects to **Rapidfix Ceilings and Partitions Ltd** processing their personal data based on its legitimate interests, **Rapidfix Ceilings and Partitions Ltd** shall cease such processing immediately, unless it can be demonstrated that **Rapidfix Ceilings and Partitions Ltd** legitimate grounds for such processing override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

Where a data subject objects to **Rapidfix Ceilings and Partitions Ltd** processing their personal data for direct marketing purposes, **Rapidfix Ceilings and Partitions Ltd** shall cease such processing immediately.

18. **Automated Decision-Making**

Rapidfix Ceilings and Partitions Ltd may use personal data in automated decision-making processes.

Where such decisions have a legal (or similarly significant effect) on data subjects, those data subjects have the right to challenge to such decisions under the GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from **Rapidfix Ceilings and Partitions Ltd**.

The right described in Part 19.2 does not apply in the following circumstances:

The decision is necessary for the entry into, or performance of, a contract between **Rapidfix Ceilings and Partitions Ltd** and the data subject;

The decision is authorised by law; or

The data subject has given their explicit consent.

19. **Profiling**

Rapidfix Ceilings and Partitions Ltd uses personal data for profiling purposes.

When personal data is used for profiling purposes, the following shall apply:

Clear information explaining the profiling shall be provided to data subjects, including the significance and likely consequences of the profiling;

Appropriate mathematical or statistical procedures shall be used;





Technical and organisational measures shall be implemented to minimise the risk of errors. If errors occur, such measures must enable them to be easily corrected; and

All personal data processed for profiling purposes shall be secured to prevent discriminatory effects arising out of profiling (see Parts 22 to 26 of this Policy for more details on data security).

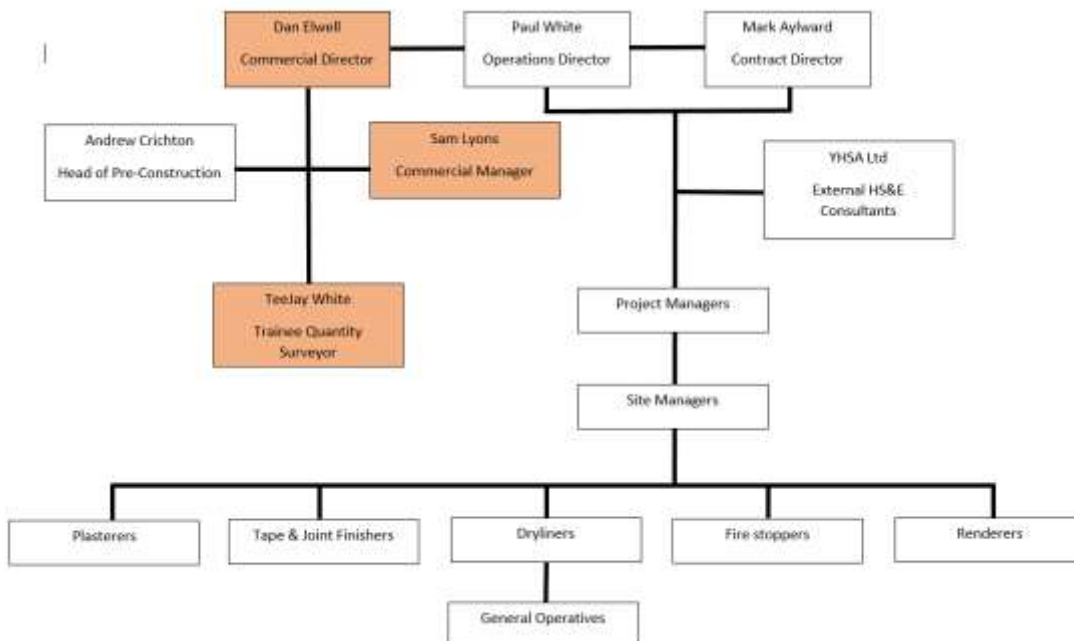
20. Personal Data Collected, Held, and Processed

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The Company's due diligence process includes.

Building long-standing relationships with suppliers and making clear our expectations of business partners evaluating the modern slavery and human trafficking risks of each new supplier if required.

This is completed using the RCP Organogram for the delegated officer as highlighted in the image below.



Procedural approach as follows for Sub-Contractor to RCP Ltd

- Sub-Contract works offered to previous and new Sub-contractors





- Sub-Contractors accept work and agreement is reached on rates/payment terms etc (Sub-contract works order form)
- Sub-Contractor submits all information required for authorisation (New Starter Form)
- New Starter form is received by DE/SL/TW
- Passport / company name / address is checked for authenticity by DE/SL/TW
- The following are verified;
 - Company Name/Sole Trader Name
 - UTR Number, VAT Number (if applicable)
 - NI Number (if applicable) is sent to RCP nominated Accountants Via email (specific CIS email) to verify CIS status and authenticity of National Insurance and VAT numbers
- Bottom section of New Starter Form (for office use only) is completed by DE/SL/TW
- Copy is scanned into Dropbox saved in Secure New Starters folder
- Hard copies destroyed.

The following personal data is collected, held, and processed by **Rapidfix Ceilings and Partitions Ltd**

Data Ref.	Type of Data	Purpose of Data
Personnel	Training and contact information	To define personnel and sub-contractors required for successfully tendered contracts.
Induction Forms PQQ	2-page form giving info of the person	To ensure that the basic information where required can be elaborated on to gain information that will be required to be secured by the Data Protection Officers within an electronic system that is password protected
New Starter Forms	Contact / Financial / NI / UTR / Next of Kin Details / Passport Details - To verify identity, for taxation, right to work status, payments, and emergency contact details	To validate that the personnel are who they say they are for Sub-Contractor supply chain due diligence purposes. This information shall be secured by the Data Protection Officers. It shall also be a demonstration that there are no issues regarding any legal right to work in the UK. This to protect workers and also to prevent modern slavery.





Sub-Contractor Reviews	Electronic review of expected works and current progress	<p>Within the review there will be questions to the Limited Company Director relating to modern Slavery and Exploitation. This is just an indicative ongoing review. The review are password encrypted on the cloud-based server.</p> <p>These reviews will be ongoing for sub-contractors that are Ltd companies with 5 or more employees.</p>
<<insert ref>>	<<insert data type>>	<<describe purpose of data>>
<<insert ref>>	<<insert data type>>	<<describe purpose of data>>





21. **Data Security - Transferring Personal Data and Communications**

Rapidfix Ceilings and Partitions Ltd shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

All emails containing personal data shall be encrypted where necessary.

All emails containing personal data must be marked “confidential”;

Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;

Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;

Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted.

Where personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;

Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient and;

All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked “confidential”.

22. **Data Security - Storage**

Rapidfix Ceilings and Partitions Ltd shall ensure that the following measures are taken with respect to the storage of personal data:

All electronic copies of personal data should be stored securely using passwords and other methods of data encryption, as necessary. This is stored currently in an encrypted virtual drive with drop-box. Access rights to this are strictly authorised.

All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;

All personal data stored electronically shall be backed up with backups stored. All backups shall be encrypted as required.

No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to **Rapidfix Ceilings and Partitions Ltd** or otherwise without the formal approval of and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary and;

No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd** where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to **Rapidfix Ceilings and Partitions Ltd** that all suitable technical and





organisational measures have been taken).

23. **Data Security - Disposal**

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please refer to **Rapidfix Ceilings and Partitions Ltd** Data Retention Policy.

24. **Data Security - Use of Personal Data**

Rapidfix Ceilings and Partitions Ltd shall ensure that the following measures are taken with respect to the use of personal data:

No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of **Rapidfix Ceilings and Partitions Ltd** requires access to any personal data that they do not already have access to, such access should be formally requested from **Dan Elwell**;

No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of **Rapidfix Ceilings and Partitions Ltd** or not, without the authorisation of **Dan Elwell**;

Personal data must always be handled with care and should not be left unattended or on view to unauthorised employees, agents, sub-contractors, or other parties at any time;

If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period, the user must lock the computer and screen before leaving it; and

Where personal data held by **Rapidfix Ceilings and Partitions Ltd** is used for marketing purposes, it shall be the responsibility of **Dan Elwell** to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

25. **Data Security - IT Security**

Rapidfix Ceilings and Partitions Ltd shall ensure that the following measures are taken with respect to IT and information security:

All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised.

All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.

Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd**, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;





All software (including, but not limited to, applications and operating systems) shall be kept up to date.

No software may be installed on any **Rapidfix Ceilings and Partitions Ltd** owned computer or device without the prior approval of the **Dan Elwell**.

26. Organisational Measures

Rapidfix Ceilings and Partitions Ltd shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

All employees, agents, contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd** shall be made fully aware of both their individual responsibilities and **Rapidfix Ceilings and Partitions Ltd** responsibilities under the GDPR and under this Policy, and shall be provided with a copy of this Policy;

Only employees, agents, sub-contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd** that need access to, and use of, personal data to carry out their assigned duties correctly shall have access to personal data held by **Rapidfix Ceilings and Partitions Ltd**;

All employees, agents, contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd** handling personal data will be appropriately trained to do so;

All employees, agents, contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd** handling personal data will be appropriately supervised;

All employees, agents, contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd** handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;

Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;

All personal data held by **Rapidfix Ceilings and Partitions Ltd** shall be reviewed periodically, as set out in **Rapidfix Ceilings and Partitions Ltd** Data Retention Policy;

The performance of those employees, agents, contractors, or other parties working on behalf of the **Rapidfix Ceilings and Partitions Ltd** handling personal data shall be regularly evaluated and reviewed;

All employees, agents, contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd** handling personal data will be bound to do so in accordance with the principles of the GDPR and this Policy by contract;

All agents, contractors, or other parties working on behalf of the **Rapidfix Ceilings and Partitions Ltd** handling personal data must ensure that all their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the **Rapidfix Ceilings and Partitions Ltd** arising out of this Policy and the GDPR; and

Where any agent, contractor or other party working on behalf of **Rapidfix Ceilings and Partitions Ltd** handling personal data fails in their obligations under this Policy that party shall





indemnify and hold harmless **Rapidfix Ceilings and Partitions Ltd** against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

27. **Transferring Personal Data to a Country Outside the EEA**

Rapidfix Ceilings and Partitions Ltd may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.

The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:

The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;

The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the GDPR); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;

The transfer is made with the informed consent of the relevant data subject(s);

The transfer is necessary for the performance of a contract between the data subject and **Rapidfix Ceilings and Partitions Ltd** (or for pre-contractual steps taken at the request of the data subject);

The transfer is necessary for important public interest reasons;

The transfer is necessary for the conduct of legal claims;

The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or

The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who can show a legitimate interest in accessing the register.

28. **Data Breach Notification**

All personal data breaches must be reported immediately to **Rapidfix Ceilings and Partitions Ltd** Data Protection Officer.

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner's Office is informed of the breach





without delay, and in any event, within 72 hours after having become aware of it.

If a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 29.2) to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

Data breach notifications shall include the following information:

The categories and approximate number of data subjects concerned;

The categories and approximate number of personal data records concerned;

The name and contact details of **Rapidfix Ceilings and Partitions Ltd** data protection officer (or other contact point where more information can be obtained);


The likely consequences of the breach;

Details of the measures taken, or proposed to be taken, by **Rapidfix Ceilings and Partitions Ltd** to address the breach including, where appropriate, measures to mitigate its possible adverse effects.





29. **This policy has been approved & authorised by:**

Signed	
Name:	Dan Elwell
Position:	Commercial Director
Date:	04/02/2021



Rapidfix Ceilings and Partitions Ltd

Subject Access Request Form

30. APPENDIX 1 -SARs Form

Important Information

Rapidfix Ceilings and Partitions Ltd collects, holds, and processes certain personal data about our **Sub-contractors**. As a data subject, you have a legal right, under UK Data Protection Legislation (including the UK GDPR and any successor legislation) to find out about our use of your personal data as follows:

- Confirmation that your personal data is being processed by us;
- Access to your personal data;
- How we use your personal data and why;
- Details of any sharing or transfers of your personal data;
- How long we hold your personal data;
- Details of your rights under UK Data Protection Legislation including, but not limited to, your rights to withdraw your consent to our use of your personal data at any time and/or to object to our processing of it.

No fee is payable under normal circumstances. We reserve the right to charge a reasonable fee for requests that are manifestly unfounded, excessive, or repetitive. Such charges will be based only on the administrative cost that we will incur in order to respond.

Please complete the required information overleaf and return it to us addressed to:
dan@rapidfixltd.net (Data Protection Officer)

You do not have to use this form and may instead write to us.

After receiving your **subject access request**, we may contact you to request additional supporting information and/or proof of your identity. This helps us to safeguard your privacy and personal data.

We will respond to all subject access requests within one month of receipt and will aim to provide all required information to you within the same period. If we require further proof of ID, or if your request is unusually complicated, we may require more time and will inform you accordingly.

If you are making a subject access request on someone else's behalf, please contact **dan@rapidfixltd.net (Data Protection Officer)**



Rapidfix Ceilings and Partitions Ltd

Subject Access Request Form

Your Details

Title:	
Forename(s):	
Surname:	
Address:	
Telephone Number:	
Email Address:	

Information Being Requested

Please provide specific details (along with any relevant dates) of the information being requested and any additional information that may help us to locate your personal data and to confirm your identity.

By completing this form, you are making a subject access request under UK Data Protection Legislation for personal data collected, processed, and held about you by us that you are entitled to receive.



Rapidfix Ceilings and Partitions Ltd

Subject Access Request Form



Declaration

By signing below, **you confirm that you are the data subject named in this Subject Access Request Form.** You warrant that you are the individual named and will fully indemnify **Rapidfix Ceilings and Partitions Ltd** for all losses and expenses incurred if you are not. We cannot accept requests in respect of your personal data from anyone else, including members of your family.

Name:	
Signature:	
Date:	

ACCEPTANCE OF POLICY BY RCP Personnel and Responsible Sub-contractors