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Diplock Fuel Injection Services Ltd
General Data Protection Regulation and Policies
(GDPR commence date 25/05/2018)

Diplock Fuel Injection Services Ltd may uphold certain information with the consent of customers and members of staff. This information will be restricted to the individuals concerned and restricted company personnel. All information and personal details withheld will not be passed to a third party without the expressed consent of the individuals concerned.

Included below further outlines the policies and procedures of Diplock Fuel Injection Services Ltd and our activities in processing and storing of personal data withheld for our General Data Protection Regulation and Policies.

Information Audit

What personal data is withheld with consent from customers?

- Contact names
- Contact address when collecting vehicles
- Contact telephone numbers
- Vehicle details including MOT dates for reminders where requested.

What personal data is withheld with consent from members of staff?

- Staff Names
- Staff Addresses
- Staff Contact numbers
- Bank Details for Bac's Payments
- PAYE and NIC details
- Contracts
- CV's
- Specific medical requirements e.g allergies, diabetes etc.

All personal information is willingly given by customers and staff and would only be given to a third party with consent of the individual concerned for purposes of legal obligations, medical or other criteria.

Customer information is processed in the interest of the customer to keep good communication, good history of vehicle maintenance and keep record of warranty on parts and work carried out. Day books and Diaries holding customer information will be kept for the current and previous year before being destroyed via shredding, any job card kept on the computer will be removed after a 6 year period for vehicle history and accounting purposes.

Staff information is kept for government purposes (NIC and PAYE), payment of wages, and health and safety requirements. This information will be kept for a maximum of 6 years for accounting purposes unless a request is processed to withdraw any information held.

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Registered in England Registered Number: 1906931

Rights of individuals

The right to be informed-

This gives individuals the right to be provided with 'fair processing of information' which is stated in the privacy notice found in the reception. The privacy notice gives individuals a transparent view of how and why certain information is kept and how long it will be kept for.

The right to access-

Individuals have the right to verification that their data is being processed and have access to their personal data and other accompanying information. The time period to respond to access enquiries is one month, with no charge given to view any information kept on the individual in question (unless certain copies are requested).

The right of rectification-

The customer will have the right to obtain rectification of any personal data held which is inaccurate, or require completion of any incomplete personal data.

The right to erasure-

Individuals have the right to be forgotten and request the deletion or removal of personal data where the data is no longer necessary for the purposes for which it was collected. There are exemptions of this, for example, in compliance with legal obligations.

The right to restrict processing -

Individuals can 'block' or suppress the processing of personal data under GDPR. If the right to restrict is used, you can keep some information about the individual so that the restriction is controlled in future, but must not further process it.

The right to data portability-

This allows individuals to obtain and reuse their personal data for their own purposes. It allows them to copy, move or transfer personal data easily from one IT environment to another in a safe and secure way. Personal data will be provided in a structured, commonly used and machine-readable form. So, if the information is requested electronically, it will be sent using a commonly used format e.g. Word, or Excel spreadsheet. This information will be provided free of charge and within one month. Consideration will be taken if any personal information involves more than one person, and whether it is will prejudice the rights of any other individuals. Any personal information held on a physical basis i.e CV's or hand written data, copies can be provided in person if requested.

The right to object-

Individuals have the right to object to the use and processing of any personal data, unless Diplock Fuel Injection Services Ltd can provide convincing legitimate grounds, the processing of personal data must stop.

The right not to be subject to automated decision-making, including profiling-

Diplock Fuel Injection Service Ltd will not create automated decision making on the behalf of individuals, any personal information provided will be willingly given by individuals with the rights listed above in place.

Subject Access Requests (SARS)

A Subject Access Request is a request for personal information that Diplock Fuel Injection Services Ltd may hold about an individual.

Upon request, Diplock Fuel Injection Services will inform individuals if any personal information is being processed. If it is, the individual is entitled to know the reasons why it is being processed, what data is being processed, any third parties who the data is sent to or will be sent to and where any information is gathered from if not from the individual.

This information will be given free of charge unless they are clearly unfounded, repetitive or the request for further copies of the same information within one month of the request. This time period can be extended if the request is complicated or multiple. However, a response stating the reasons for the extension must be given within the one month period.

If the request for any personal data held about an individual has been made electronically, the reply will be communicated electronically after reasonable measures have been made to confirm the identity of the individual making the request.

Diplock Fuel Injection Services Ltd are able to refuse to grant an access request if the request is found to be manifestly unfounded or excessive.

Lawful Basis for Processing Personal Data

Diplock Fuel Injection Service Ltd must have a minimum of one of the following lawful basis to hold and process personal information.

Consent-

Processing is permitted if the data subject has given consent to processing this can be in the form of a signed document, voluntarily ticking an agreement box or face to face. Consent will be documented when and how it is given include what has been said at the time of the consent being given. Consents will be reassessed every 5 years to check that the relationship, processing and the objectives have not changed

Contractual-

For example, processing addresses of the data subject so that processing payment for goods or services where the customer is not present to make card payments or the collection of goods or vehicle is requested. In the event that an individual requests information from Diplock fuel Injection Services Ltd in relation to parts or services to be provided, the processing of that individuals personal data is required for responding to the enquiry.

Legitimate interests-

As a private-sector organisation Diplock Fuel Injection Services Ltd will process personal data without consent if a genuine or legitimate reason (including commercial benefit) is given, unless it is considered to outweigh and harm the individuals rights and interests. If the individual concerned objects to the consent it will be considered, but may be rejected if compelling reasons are concerned.

Compliance with legal obligations-

When supplying keys or number plates, data may be required to be stored for proof of ownership to meet legal obligations.

Vital interest-

Individuals will be obliged to provide vital data in the interest of the wellbeing, health and life of the data subject or that of another person i.e. next of kin.

Data Breaches

The GDPR defines a personal data breach as 'a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to person data'.

This means there has to be more than just loss of personal data. Diplock Fuel Injection Services will report certain breaches to regulatory authorities where such an occurrence is likely to result in a high risk to the rights and freedoms of individuals, these individuals will also be informed. This 'high risk' means the bar for having to let individuals know of a breach is higher than for notifying the relevant supervisory authority.

Diplock Fuel Injection Services are only obliged to notify the relevant supervisory authority of a breach where it is likely to result in the risk to the rights and freedoms of individuals where it is likely to have a significant negative impact for the individual. This includes causing discrimination, reputational damage, monetary loss, loss of confidentiality or any other significant disadvantage. Once a breach has been identified as notifiable it will be reported to the relevant supervisory authority within 72 hours of the organisation being made aware of the breach. The GDPR gives some leeway as it recognises that an investigation can not be completed in this time frame and allows the organisation to compile the evidence in stages.

If the breach is considered to not cause high risk to the individual and result in discrimination, reputational damage, monetary loss, loss of confidentiality or any other significant disadvantage an internal investigation will be carried out.

Data Protection Impact Assessment (DPIA)

DPIA is a mandatory requirement under GDPR where businesses have a general obligation to implement technical and organisational measures to show that they have considered and integrated data protection into their processing activities. DPIAs, obligatory under certain circumstances, are the way that Diplock Fuel Injection Services can recognise the most effective method to meet our data protection requirements and meet our customer's requirements to keep their information private. Carrying out DPIAs allows Diplock Fuel Injection Services Ltd to ease problems and ultimately to help to reduce associated costs and damage to reputation which might otherwise occur.

DPIAs will be carried out only for operations that are 'likely to result in a high risk to the rights and freedoms of natural persons'.

In order to determine if an operation is to be deemed as high risk, the regulation states that an evaluation should be carried out based on the nature, scope, context and purposes of the

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processing. This will identify any threats such as leaks and breaches which could do harm, calculate the probability of those threats occurring and recommend actions to reduce the risk, i.e. carry out a risk assessment. The assessment will include but is not limited to:

- The use of CCTV and other monitoring in public areas
- Appraisal
- Sensitive data including locational and financial data
- Large amounts of personal data being processed
- Data that has been combined from 2 or more sources or operations
- Data concerning vulnerable data subjects such as employees, children, vulnerable adults or any other unequal power situations.

Risk assessments will be carried out on a regular basis under good practice to ensure no new risks to the rights of individuals go un-noticed.