

Privacy Policy

Policy Introduction

Boldon Bees regards the lawful and correct processing of personal and sensitive data as an integral part of its purpose. This is vital for maintaining the confidence of customers, suppliers, employees and other stakeholders about whom we process data.

Privacy Policy Statement

Boldon Bees will meet its legal obligations concerning confidentiality and data security standards, and are based upon the *General Data Protection Regulation (GDPR)*, which is legislation covering data security and confidentiality of personal data.

The key principles of this policy are as follows:

- Boldon Bees will fully implement all aspects of GDPR
- Boldon Bees will ensure all employees and others handling personal data are aware of their obligations and rights under GDPR, and
- Boldon Bees will implement adequate and appropriate measures to ensure the security of all data contained in or handled by its systems

This policy provides guidance about the protection, sharing and disclosure of personal data within Boldon Bees.

Personal and Sensitive Data

Any information about an individual from which that person can be identified.

This could include the following: -

- Names, addresses, emails, phone numbers and other contact information
- Some financial information including national insurance numbers, date of birth and payroll data
- Racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and any personal data relating to criminal offences and convictions.

Date Protection Principles

Boldon Bees adheres to the data protection principles set out in the GDPR, which requires that all personal data be:

- processed lawfully, fairly and in a transparent manner
- collected only for specified, explicit and legitimate 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
- not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed
- processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage

Boldon Bees must be able to demonstrate compliance with the data protection principles above at all time. Data must not be used for any other purpose.

Personal data can be in computerised and/or in a physical format. It may include such documentation as:

- paper documents (e.g. letters received and sent)
- electronic records
- printouts
- photographs, and
- videos and tape recordings

Backup data (e.g. archived data or disaster recovery records) also falls under GDPR; a search within them should only be conducted if specifically asked for by the Management.

Individuals Rights of Access

The GDPR gives every living person (or their authorised representative) the right to apply for access to the personal data which organisations hold about them irrespective of when and how this is compiled (e.g. hand written records, electronic and manual records held in a structured file). This is called a 'Subject Access Request'.

Boldon Bee's Duties

Our duty is to use the following appropriate measures and controls to comply with the Data Protection Principles: -

- ensure there are lawful grounds for using any personal data and its only used for the purpose it was given
- ensure that the use of the data is fair and meets one of the specified conditions
- explain to individuals, at the time their personal data is collected, how that information will be used
- only obtain and use personal data for those purposes which are known to the individual
- keep personal data accurate, up to date and only held for as long as is necessary
- take appropriate technical and organisational security measures to safeguard personal data

In addition, Boldon Bees will ensure that:

- everyone managing and handling personal data understands that they are legally responsible for following good data protection practice and has read this privacy policy
- enquiries about handling personal data are dealt with promptly
- methods of handling personal data are clearly described in policies and guidance
- a review of data protection arrangements is regularly undertaken
- methods of handling personal data are regularly assessed and evaluated, and

- suitable protections are in place before any personal data is transferred to a third party

Employees Roles and Responsibilities

Maintaining confidentiality and adhering to data protection legislation applies to everyone at Boldon Bees. We will take necessary steps to ensure that everyone managing and processing personal data understands that they are responsible for following good data protection practice. Employees will receive training and must read this policy as part of their induction.

All employees have a responsibility to:

- observe all guidance in relation to obtaining, using and disclosing personal data
- obtain and process personal data only for specified purposes
- only access personal data that is specifically required to carry out their activity or work
- record data accurately in both manual and electronic records
- ensure any personal data held is kept secure
- ensure that personal data is not disclosed in any form to any unauthorised third party, and
- ensure personal data is sent securely

Failure by an individual to adhere to any guidance in this policy may result in disciplinary action.

Management

The Management are responsible for:

- determining what personal data is held ensuring that the data is adequately secure, access is controlled and that the data is only used for the intended purposes
- providing clear messaging to their teams about data protection requirements and measures

- ensuring personal data is only held for the purpose intended
- ensuring personal data is not communicated or shared for non-authorised purposes, and
- ensuring personal data is password protected when transmitted electronically or appropriate security measures are taken to protect the data when in transit or storage

Information Commissioner's Office (ICO)

The ICO is the UK's independent authority set up to uphold information rights in the public interest and data privacy for individuals. The ICO has wide-ranging powers to investigate complaints relating to use of personal data and personal data breaches. Any failure to comply with data protection obligations may lead to investigation by the ICO which could result in serious financial or other consequences for Boldon Bees.

If a data breach is suspected, the person who identified the breach should immediately notify the Management and provide all relevant details regarding the breach. Following notification of a breach, the Management will take the following action as a matter of urgency:

- implement a recovery plan, which will include damage limitation
- assess the risks associated with the breach
- inform the appropriate people and organisations that the breach has occurred, and
- review Boldon Bees response and update our information security as appropriate



Signed:-

Date:- 1st July 2025

R. Balzi (NEBOSH) –Manager, responsible for Health and Safety