

Data Protection Policy

Purpose of this policy

This policy is a statement of CQR Company's commitment to protect the rights and privacy of individuals in accordance with the Data Protection Acts.

Individuals' Responsibilities

Any staff member of CQR Company who is involved in the collection, storage or processing of personal data has responsibilities under the legislation:.

Any staff member involved in the processing/storing of personal data should make sure;

- to obtain and process personal data fairly.
- to keep such data only for explicit and lawful purposes.
- to disclose such data only in ways compatible with these purposes
- to keep such data safe and secure.
- to keep such data accurate, complete and up-to-date.
- to ensure that such data is adequate, relevant and not excessive.
- to retain such data for no longer than is necessary for the explicit purpose.

Any data access requests received should be forwarded immediately to the Manager, Compliance & Information Management.

Individual Rights

The individuals for whom CQR Company stores personal data have the following rights:

- to have their personal data obtained and processed fairly
- to have personal data kept securely and not illegitimately disclosed to others.
- to be informed of the identity of the Data Controller and of the purpose for which the information is held.
- to get a copy of their personal data.
- to have their personal data corrected or deleted if inaccurate.
- to prevent their personal data from being used for certain purposes: for example, one might want to have the data blocked for research purposes where it is held for other purposes.
- under Employment Rights, not to be forced to disclose information to a prospective employer. No one can force another person to make an access request, or reveal the results of an access request, as a condition of recruitment, employment or provision of a service. Where vetting for employment purposes is necessary, this can be facilitated where the individual gives consent to the data controller to release personal data to a third party.
- It should be noted that under the Freedom of Information Act 2014, records containing personal information may be released to a third party, where the public interest so requires.

Principles of the Acts

CQR Company will administer its responsibilities under the legislation in accordance with the eight stated data protection principles outlined in the Act as follows:

1. Obtain and process information fairly.

CQR Company will obtain and process personal data fairly and in accordance with the fulfilment of its functions.

2. Keep data only for one or more specified, explicit and lawful purposes.

CQR Company will keep data for purposes that are specific, lawful and clearly stated and the data will only be processed in a manner compatible with these purposes.

3. Use and disclose data only in ways compatible with these purposes.

CQR Company will only disclose personal data that is necessary for the purpose/s or compatible with the purpose/s for which it collects and keeps the data.

4. Keep data safe and secure.

CQR Company will take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction. CQR Company is aware that high standards of security are essential for all personal data.

5. Keep data accurate, complete and up-to-date.

CQR Company will have procedures that are adequate to ensure high levels of data accuracy. CQR Company will examine the general requirement to keep personal data up-to-date. CQR Company will put in place appropriate procedures to assist staff in keeping data up-to-date.

6. Ensure that data are adequate, relevant and not excessive.

Personal data held by CQR Company will be adequate, relevant and not excessive in relation to the purpose/s for which it is kept.

7. Retain data for no longer than is necessary for the purpose or purposes for which they are kept.

CQR Company will have a policy on retention periods for personal data.

8. Give a copy of his/her personal data to that individual, on request

CQR Company will have procedures in place to ensure that data subjects can exercise their rights under the Data Protection legislation.

Roles/Responsibilities of CQR Company

CQR Company has overall responsibility for ensuring compliance with the Data Protection legislation. However, all employees of CQR Company who collect and/or control the contents and use of personal data are also responsible for compliance with the Data Protection legislation. CQR Company will provide support, assistance, advice and training to all relevant Departments, Offices and staff to ensure it is in a position to comply with the legislation.

CQR Company is registered as a Data Controller in compliance the Act and the following roles are included in the registration,

Contact Person: Manager, Compliance & Information Management

Compliance Person: Manager, Compliance & Information Management

Procedures and Guidelines

This policy supports the provision of a structure to assist in CQR Company's compliance with the Data Protection legislation, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

Review

This Policy will be reviewed regularly in light of any legislative or other relevant indicators.