



PEDL-226

DATA PROTECTION

1 Purpose

All organisations, businesses and employees have a legal obligation to comply with the General Data Protection Regulation (GDPR) and PEDL is committed to protecting the privacy and security of personal information.

2 Responsibilities

Everyone who works at PEDL is responsible for ensuring that personal data is collected, stored and handled correctly.

The Managing Director is ultimately responsible for ensuring personal data is dealt with appropriately and in line with the applicable laws.

However, PEDL Board of Directors hold ultimate responsibility for ensuring that PEDL meets its legal obligations.

3 GDPR Principles

This policy is underpinned by 6 key principals which are shared in common with GDPR. These are that all personal dates must be:

- **Processed lawfully, fairly and in a transparent manner** – PEDL will inform individuals what processing will occur (transparency), and the processing will match the description given to the individual (fairness), and will be for a purpose specified in the applicable data protection law, where applicable (lawful)
- **Collected for specified, explicit and legitimate purposes** – PEDL will not process personal for a purpose other than what has been specified
- **Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed** – PEDL will only process personal data where it is necessary for the specified purpose
- **Accurate and where necessary, kept up-to-date and where possible, erased or rectified without delay** – PEDL will make all individuals aware of their duty to keep the company up to date with regards their personal details. PEDL will maintain accurate records and, where permitted by law, shall erase personal data when requested to do so by the relevant individual
- **Stored for no longer than is necessary** – PEDL has in place policies regarding the retention of personal data to ensure that data retention terms align with local laws
- **Processed in a manner that ensures appropriate security of personal data** – PEDL has policies in places which address the secure storage and transfer of personal data

4 Data Collection

PEDL will only collect personal data from an individual if one of the following apply:

- The nature of the business purpose necessitates collection of the personal data from other persons or bodies



- The collection must be carried out under emergency circumstances in order to protect the vital interests of the individual or to prevent serious loss or injury to another person

If it is determined that notification to an individual is required, notification should occur promptly.

5 Data Storage

PEDL shall use appropriate measures to safely store all personal data, taking into account the nature of the data.

Examples of Secure Storage

- Keeping data locked in a filing cabinet, drawer, cupboards or rooms with access restricted to authorised individuals.
- If the data is computerised, ensuring that the data is secure and access protected and kept only accessible to authorised personnel.

6 Data Transfer

PEDL shall use all appropriate measures to ensure that all transfers of personal data are carried out securely, taking into account the nature of the data.

Sharing candidate personal information with Awarding Bodies

Personal data should not be generally disclosed to third parties without the permission of the individual concerned. Third parties include family members, friends, employers, prospective employers, training and employment agencies, local authorities and the police.

However, in order to comply with Awarding Body requirements (BCS/EAL/SQA), all candidates must sign giving permission for PEDL to share their personal information with the appropriate awarding body for registration and certification purposes.

7 Personal Data Breach Policy

PEDL has appropriate measures in place to ensure that data breach is managed appropriately and where necessary reported to the relevant authority. Everyone who works for PEDL must comply with PEDL – 239 Personal Data Breach Policy.

7 Data Retention Policy

PEDL has appropriate measures in place to ensure personal data records are maintained for no longer than necessary. Everyone who works for PEDL must comply with the PEDL- 238 Record Retention Policy.

Signed _____

Position _____

Date _____