



General Data Protection Policy

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1. Purpose of the Policy

This policy sets out how Noriker Power, 4th Floor, The Quadrangle Imperial Square, Imperial Square, Cheltenham GL50 1PZ manages the requirements of the General Data Protection Regulation (GDPR).

<https://www.gov.uk/data-protection>

2. Scope

The Scope of this policy applies to the Personal Information/ Data which Noriker Power processes and stores in regards of its employees.

3. Terminology

Personal Data: any information identifying a data subject or information relating to a data subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers possessed.

Data Protection Officer (DPO): the person appointed as such under the GDPR and in accordance with its requirements. A DPO is responsible for providing advice, cooperating with the Information Commissioner's Office (ICO) and acting as a point of contact with the ICO.

Consent: agreement which must be freely given, specific, informed and be an unambiguous indication of the data subject's wishes by which they, by a statement or by a clear positive action, signifies agreement to the processing of personal data relating to them.

4. Principles

4.1 Information held

Noriker Power collects and retains the following information regarding its employees:

- Name
- Home address
- Telephone number
- Date of birth
- National Insurance number

- Tax code
- Bank account details
- Examinations passed/qualifications gained
- Emergency contact
- Contract
- References from previous employers
- Employment history with the organisation
- Employment terms and conditions (eg pay, hours of work, holidays, benefits, absence)
- Any disciplinary action
- Any accidents connected with work
- Driving licence penalties (if you are required to drive on Company business)
- Conflict, or potential conflict of interest

The above information is held in regards to employment status and for the employee's protection.

It is important that the above information is kept accurate and up to date.

Employees **must** notify line manager immediately if any changes in circumstances or details in personal information changes.

It the responsibility of the employee to notify the company.

Noriker Power may wish to keep some information relating to Equality and Diversity.

However the employee/ or prospective applicant **must consent** and Noriker Power is responsible to safeguard this "sensitive" data under stronger protection:

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification;ie fingerprint)
- health and medical condition
- sex life or orientation

- criminal convictions and offences

4.2 Use of information

Noriker Power ensures that the information held is used fairly, lawfully and transparently.

Noriker Power ensures that the information is only collected for specified, explicit and legitimate purposes.

Noriker Power ensures that the information is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

Noriker Power ensures that the information is used in a way that is adequate, relevant and limited to only what is necessary.

Noriker Power ensures that the information can be used to help with training and development at work.

Noriker Power ensures that the information is processed in a manner that ensures its security, using appropriate technical and organisational measures to against unauthorised or unlawful processing and against accidental loss, destruction or damage (Security, integrity and confidentiality)

4.3 Length of retention

Noriker Power statutory retention periods will be :

Employee information including P60s and P45s will be kept for a maximum of 6 years after they leave the company.

Payroll records, Maternity, Paternity or Shared Parental Pay records will be kept for 3 years after the end of the tax year that the payment stopped.

Job applicant information like Cover letters, CVs, and interview notes will be kept for at least 12 months as part of the talent pool, and to prevent unwarranted replication. Consent will be required if Noriker Power wish for the data to be kept longer.

If consent is not granted or upon the end of 12 months, Noriker Power will remove all information from the talent pool.

4.4 How the information is kept and handled

Noriker Power ensures that the information:

- Is kept for any longer than needed for the legitimate business purpose to which the information was collected

- Is kept within separate confidential folders for Personal data, Financial data, “Sensitive” data and all documents are password protected.
- Is handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing.
- Is granted access only to those who need to know and are authorised to use personal data for specific business purposes.
- Is not disclosed either verbally or in writing, accidental or otherwise to any unauthorised third party.

In the event of any data protection breaches Noriker appointed Data Protection Officer (DPO) will investigate the situation with the support of Information Commissioner’s Office to resolution.

4.5 Sharing of information

Noriker Power will request consent to share your personal information with any external party.

4.6 Disposal of information

Once the retention period is over Noriker Power ensures that the personal data will be deleted from their system securely.

Any hard copies will be shredded.

4.7 How people know about the information

The GDPR policy is kept in an accessible folder for staff to view. (Dropbox>Admin>Policies)

The staff hand book makes reference to its existence and its location and references the government support website.

Staff are given an understanding of the use of their data at the induction stage. This is recorded within the HR induction NP for each staff member and kept securely.

5. Data rights

5.1 Your rights

Under the Data Protection Act 2018, you have the right to find out what information the government and other organisations store about you. These include the right to:

- be informed about how and why your data is being used
- be informed where the data came from
- who can see the information
- request personal data
- have incorrect data updated
- have data erased

- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances/request their data is not used for certain purposes
- make a complaint to the Information Commissioner's Office

You also have rights when an organisation is using your personal data for:

- automated decision-making processes (without human involvement)
- profiling, for example to predict your behaviour or interests

5.2 Noriker Power rights

Noriker Power must make sure the information is kept secure, accurate and up to date.

Noriker Power must acknowledge the individuals' right to request personal data.

Before the request is granted Noriker Power will

- check the identity of the requester
- identify the purpose of the request
- remove any data which does not relate to them

Once the request has been granted Noriker Power will:

- record the request,
- provide the information within 30 days,
- provide a copy (either hard copy or via electronic means if authorised) of the data,
- inform how the data was collected
- inform how it will be disposed of.

Noriker Power will be exempt to provide personal information held about someone if it contains legal advice or relates to another person.

6. Data protection officer

6.1 Data protection registration

Noriker Power ltd is registered with the Information Commissioner's Office (ICO).

<https://ico.org.uk/>

6.2 Data protection officers

Noriker Power ltd has nominated Jenny Wang as the DPO for general data protection.

The responsibility of the DPO is to:

- advise Noriker of its obligations under Data Protection Law, for monitoring compliance with data protection law,
- monitor compliance with the regulation and
- cooperate and act as the contact point with the ICO.