



AP 015 Data Protection Policy	Rev No: 2	Issue Date 16/09/2020	Written By: Brian Purcell	Approved By: Chris Mee
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Purpose

The purpose of this policy is to outline the measures taken by the Chris Mee Group to manage all personal data that is processed by the company.

Scope

This policy applies to managers, employees of the Chris Mee Group (permanent and temporary) and contractors carrying out duties on behalf of the Chris Mee Group.

Responsibility

It is the responsibility of management, employees and contractors to be aware of, and to adhere to, this policy.

Policy

It is the policy of the Chris Mee Group to protect personal data processed during the course of providing the company's core services and other related activities in line with the General Data Protection Regulation (GDPR). Due to the nature of services provided by the Chris Mee Group, personal data must be processed in order to complete these services. All personal data processed by the Chris Mee Group will be done so fairly, lawfully and transparently. This policy will outline how the Chris Mee Group collects, stores, shares and retains personal data of those who work for CMSE as well as those who avail of our services.

Definitions

Data is information which is stored electronically, on a computer, or in certain paper-based filing systems. This would include IT systems.

Personal data means any information relating to an identified or identifiable natural person i.e. data relating to a living individual who can be identified from that data (or from that data and other information that is in, or is likely to come into, the possession of the data controller). Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal).

Data controllers are the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Data processor is a person who processes personal data on behalf of a data controller but does not include an employee of a data controller who processes such data in the course of his employment.

Processing means performing any operation or set of operations on data, including:

- obtaining, recording or keeping data,
- collecting, organising, structuring, storing, altering or adapting the data,
- retrieving, consulting or using the data,
- disclosing the information or data by transmitting, disseminating or otherwise making it available,
- aligning, combining, restricting, blocking, erasing or destroying the data.



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Sensitive personal data are specific categories of personal data including information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, physical or mental health or condition, genetic or biometric data, sexual orientation or sexual life, criminal record, convictions or the alleged convictions of an offence. Sensitive personal data can only be processed under strict conditions and will usually require the express consent of the person concerned.

Data Collection

CMSE processes the following personal data:

- **Employees:** in order to comply with legal obligations and to perform the duties of the contract of employment. Personal data is normally obtained directly from the employee concerned, however some information may be collected from third parties (e.g. reference checks). Personal data will only be used for necessary HR management purposes. Where there is a need to process personal data beyond these means, CMSE will inform employees of this. For the purposes of employment, CMSE will act as a data controller.
- **Contractors:** in order to comply with legal obligations and to perform the duties of the contract for services. Personal data is normally obtained directly from the contractor; however, some information may be collected from third parties (e.g. reference checks). Personal data will only be used for necessary contract management purposes. Where there is a need to process personal data beyond these means, CMSE will inform contractors of this. For the purposes of a contract for services, CMSE will act as a data controller.
- **Clients and Individuals:** CMSE processes personal data in order to provide services to clients, employees of clients and individuals wishing to avail of our services. This data may be sourced directly from clients or individuals, or indirectly from third parties who we have contracted to assist with services on our behalf. This information may be collected from various sources such as:
 - website (course bookings, general enquiries, all interactions, etc.)
 - recruitment websites
 - clients availing of services (training, consultancy, recruitment)
 - individuals availing of services

The Chris Mee Group endeavours to only collect data that is adequate, relevant and is limited to the purpose for which it is required. We will take all reasonable steps to ensure that the data is accurate and up-to-date at all times. For the purposes of CMSE providing services to clients, CMSE will act as a data processor except in the case where individuals contract CMSE themselves. In these instances, CMSE will act as a data controller.

Data Storage

All reasonably necessary steps will be taken to ensure that all Personal Data is treated securely in accordance with this Data Protection policy and the relevant regulation. In particular, we have put in place appropriate technical and organisational measures to safeguard and secure the information we manage and collect, appropriate to its means.



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Once we have received information, we will use strict measures and security features for the purpose of preventing unauthorised access and ensuring that only those who need to have access to your Personal Data can access it.

We also use secure connections to protect Personal Data during its transmission.

Data Sharing

CMSE will need to share relevant specific information in order to provide our services to you. We will always ensure that we will comply with the regulation when we transfer Personal Data. We will also ensure that any processor or sub-processor takes appropriate technical and organisational measures when processing Personal Data on our behalf.

Data Retention

The Chris Mee Group maintains a Register of Processing which includes a retention policy for all data that is stored on our systems and premises. All data is disposed of securely in line with GDPR guidelines. All material containing personal data will be confidentially shredded and/or deleted.

Rights

The rights of all individuals who avail of services from the Chris Me Group, including those under the instruction of their employers, are protected by the rights set out under GDPR. These include the rights:

- To request the information that we have on you (access)
- To rectify information that we have that may be incorrect (accuracy)
- To delete information that we have on you (delete)
- To restrict the personal data that we process (withdraw)
- To transfer your data to another provider (portability)
- To make a complaint (complain)

Transfer of Data Outside of the E.U.

CMSE make every effort to ensure that all personal data processed by the company is done so within the E.U. Where this is not possible, we will ensure that an adequate standard of protection is applied to any transfer which is comparable under GDPR.

Breach

In the event of a data breach, the Breach Management procedure must be followed.

Data Rights Requests

Individuals who wish to make a data rights request must follow the Data Rights Request procedure.

Related Documents

- Register of Processing
- SOP 027 Data Rights Protection
- Data Rights Request form



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- SOP 025 Breach Management

Review

This policy will be reviewed in accordance with legislative changes to Data Protection laws.

Rev	Date	Reason for Change	Author	Approver
0		Initial Release		C Mee
1	14/09/2020	Update to reflect requirements of GDPR	B Purcell	O Molloy
2	16/09/2020	Change name of approver	B Purcell	C Mee