

Author	Owner	Date of release	Related MSP	Related PRO	Issue Ref	Index Ref
QSE	QSE	May 2018	MSP13-17-C	PRO 05-17-A	A	MSP22-18-A

Data Protection and Fair Processing Policy

Rosh Engineering Ltd

Last updated	15 th May 2018
--------------	---------------------------

Definitions

GDPR	means the General Data Protection Regulation.
Responsible Person	means "QSE Manager"
Register of Systems	means a register of all systems or contexts in which personal data is processed by the company.
Personal Data	Any data that is capable of identifying a data subject. Either directly or indirectly.

1. Data protection principles

Rosh Engineering Ltd is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Author	Owner	Date of release	Related MSP	Related PRO	Issue Ref	Index Ref
QSE	QSE	May 2018	MSP13-17-C	PRO 05-17-A	A	MSP22-18-A

2. General provisions

- a. This policy applies to all personal data processed by Rosh Engineering Ltd.
- b. The Responsible Person shall take responsibility for Rosh Engineering Ltd.'s ongoing compliance with this policy.
- c. Rosh Engineering Ltd are , for the purposes of the GDPR , the 'Data Controller.
- d. This policy shall be reviewed at least annually.
- e. Rosh Engineering Ltd shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Rosh Engineering Ltd shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to Rosh Engineering Ltd shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by Rosh Engineering Ltd must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. Rosh Engineering Ltd shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the systems.

5. Data minimisation

- a. Rosh Engineering Ltd shall ensure that any personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Where personal data is required to be held to satisfy the requirements of other over riding regulations it shall ensure the data held is minimised to what is solely required for that purpose.

6. Accuracy

- a. Rosh Engineering Ltd shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

Author	Owner	Date of release	Related MSP	Related PRO	Issue Ref	Index Ref
QSE	QSE	May 2018	MSP13-17-C	PRO 05-17-A	A	MSP22-18-A

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Rosh Engineering Ltd shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. Rosh Engineering Ltd shall ensure that personal data is stored securely either using modern software that is kept-up-to-date, or in hard copy form held securely with limited access.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable and a record kept of when and how this occurs.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Rosh Engineering Ltd shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY