



## Data Protection Arrangements – the B-Safe Approach

<b>Our name is:</b> B-Safe Health & Safety Services Ltd				
<b>Our address is:</b> The Annexe, 8 Kenwick Drive, GRANTHAM, Lincs NG31 9DP.				
<b>Our contact info:</b>	<b>Phone:</b>	(01476) 347444	<b>Email:</b>	admin@b-safe.org.uk
<b>Introduction:</b> The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information for individuals within European Union (EU). GDPR became effective on 25 <sup>th</sup> May 2018. Unlike the Data Protection Act 1998, GDPR applies to the whole of EU. It is enforced by the Information Commissioners Office (ICO).				
<b>Personal information</b> means information about a living individual that can identify them. It could include name, address, email, telephone number and other financial information.				
<b>Sources of information:</b> We may obtain information from:				
You directly	From a Third Party acting on your behalf, eg close family member, business associate.	From publicly available sources eg Companies House, your website, other service provider.	From Other organisations	Generate it ourselves
<b>Our approach:</b> The ability to provide our clients with the reassurance that any data held by us is relevant, securely maintained and administered according to GDPR is a key business driver for us. So, it is our intention to comply with the Regulations. We have conducted an appropriate Risk Assessment and acted upon the findings.				
<b>Data Protection Officer (DPO):</b> Due to the nature and size of our business operations we are not required to appoint a DPO and so have not done so.				
<b>Staff training:</b> All Employees have received training in GDPR compliance from an externally accredited provider. This includes misuse, data security, loss/theft and “phishing.”				
<b>Personal Information we hold may include some/all of the following:</b>				
Type of data	Description of data	Examples as to how we use that data		
Contact information	Name Address Phone/email How to contact you (permissions)	To confirm your identity. To carry out your instructions. Analysis and profiling. Client Relationship Management (CRM)		
Transactional information.	Product/service information. Review/expiry date.	Servicing your products. Analysis and profiling.		
Contractual information	Copies of current contracts between us &/or instructions requests from you.	Servicing your products.		
Consent and preferences	Telephone. Email.	In-house Marketing. CRM.		
Technical data	Details on devices and technology you use. Details of periodic inspection & testing undertaken by others	Servicing current products. Conducting Risk Assessments.		
Open data and public records	Information about you that is openly available on the Internet or public sources.	Servicing your products. Legitimate interests. CRM.		
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We may process your personal data to comply with any legal obligation that falls upon us.				
<b>The top 5 causes of data breaches and how we intend to deal:</b>				
<b>Phishing</b>	<p><i>"Phishing" emails may be received requesting information or inviting a reply. Clicking on a reply may allow compromise our electronic records. Vigilance is required.</i></p> <p><i>Our Users are instructed to ignore/delete any emails that they suspect may be phishing and not to click on any links.</i></p>			
<b>Loss or theft of corporate asset(s).</b>	<p><i>Portable devices including laptops, Tablets and mobile phones are both encrypted, and password protected.</i></p> <p><i>Screens are turned off and devices put to sleep when left unattended, even for short periods.</i></p> <p><i>Mobile devices are not left unattended in public places.</i></p> <p><i>Devices left in motor vehicles will be secreted out of sight and the vehicle locked.</i></p> <p><i>Our premises has an intruder alarm maintained by external SSAIB accredited company which is put into operation whenever it is left unattended.</i></p>			
<b>External attack.</b>	<p><i>Security protection and malware is installed across all our IT equipment. This is maintained by a trusted external IT Company.</i></p>			
<b>Abuse by insider:</b>	<p><i>Due to the size and nature of our business operations we do not expect this to be an issue. Employee turnover over last 5 years is 0%.</i></p> <p><i>The use of USB or memory sticks for any data is not permitted.</i></p>			
<b>Inadvertent misuse by Insider:</b>	<p><i>All Our Users have received training in compliance with GDPR.</i></p> <p><i>All Our Users are subject to ad hoc checks of their systems and hardware equipment.</i></p> <p><i>Audit trails are maintained to demonstrate a file's chain of custody.</i></p> <p><i>The Directors can revoke individual access to either all data or particular files and/or control data sharing within our Business. This can be achieved remotely if required.</i></p>			
<p><b>Transferring your data outside the EU:</b> Data held by Us is stored securely within the European Economic Area (EEA) and regularly backed up. Before we transfer any data outside the EEA, we will take all reasonable steps to make sure your data is treated securely.</p>				
<p><b>Withdrawal of consent:</b> You may withdraw consent for us to hold data at any time and/or to have data removed– <i>right to erasure</i>. You can do this by written request to:</p> <p>Email: <a href="mailto:admin@b-safe.org.uk">admin@b-safe.org.uk</a></p> <p>Mail: B-Safe Health &amp; Safety Services Ltd The Annexe, 8 Kenwick Drive GRANTHAM NG31 9DP. T: (01476) 347444.</p> <p>PLEASE NOTE: We are unable to accept verbal instructions to delete/amend data.</p>				
<p><b>Copy of data held:</b> You are entitled to see a copy of your personal data that we hold. This is known as a Subject Access Request (SAR). You are also entitled to ask for data to be amended or removed. Requests should be made as above. We make no charge for this although we reserve the right to charge a reasonable fee for Our administrative costs in replying to a request. We intend to respond to requests within 1 calendar month of receiving the request. Our preferred method of response is Recorded Delivery (signed for) post to your last notified address as held on our records.</p>				
<p><b>How long we'll keep your information:</b> We'll keep your information for as long as you have a relationship with Us. After that has ended, we'll only keep it where we may need it for legitimate purposes. This includes helping us respond to complaints and where we are required to do so by Law. Please see also next Section.</p>				
<p><b>Removal of data:</b> We will remove/delete data in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Where you have instructed us to do so.</li> </ul>				
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- Which is time limited by law or legislation.
- When your account with us has been inactive for over 24 months.

**In good faith:** We cannot be held liable for any loss or damage where we have acted in good faith on instructions purporting to be from you and where those instructions turn out to be fraudulent. We may, at our discretion, take reasonable steps to authenticate any instructions received before acting upon them but are not obliged to do so.

**Breaches & Reporting:** We intend to comply with relevant GDPR requirements in these areas.

**Emails:** For your protection our emails are encrypted, and we hold SSL certification. As evidence of this our website – <https://www.b-safe.org.uk> – includes the *secure padlock* prefix. Be aware that, emails may not be secure and so you should be careful as to what data is sent via email.

**Review:** These arrangements will be periodically reviewed and updated by us.

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