



NSC Data Protection Policy

Reference: NSC-566-487 V1.0

Date: 21 May 2018

1 Introduction

NSC are subject to the Data Protection Act in the UK and, for our processing activities in Europe, the Data Protection Directive 95/46/EC and e-Privacy Directive 2002/58/EC (together with national implementing legislation), and, effective May 25, 2018, the General Data Protection Regulation 2016/679 (together referred to as “Applicable Legislation”).

In common with all organizations that collect data about employees and customers (personal data), the Board and management of NSC are committed to protecting the rights and privacy of individuals whose information it collects and NSC has an obligation to ensure that such data collection and usage is undertaken fully in accordance with the Applicable Legislation. To comply information about individuals must be collected and used fairly, stored safely and securely and not disclosed unlawfully to any third party.

This policy applies to all staff and third parties including, agents, contractors or suppliers to NSC who may have access to personal data. Any breach of the Applicable Legislation or this Policy will be dealt with under NSC’s disciplinary policy and may also be a criminal offence, in which case the matter will be reported to the appropriate authorities.

It is the responsibility of NSC to ensure that NSC has suitable Data Protection notifications in place to cover the personal data that may be processed by NSC. All employees should ensure that any personal data that they process, or cause to be processed, are suitably covered by these notifications.

Management and all those in managerial or supervisory roles throughout NSC are responsible for developing and encouraging good information handling practices within their area of responsibility.

All NSC employees, or other persons temporarily employed by NSC, who have access to personal data about other individuals has a duty to keep it secure. Any unauthorised disclosure of personal data held or processed by NSC will be investigated and appropriate disciplinary action taken. This may lead to summary dismissal and, in some cases, prosecution.

All NSC employees are responsible for compliance with the provisions of the Applicable Legislation, in particular the principles which are summarised as follows;

Personal Data shall:

- be processed fairly and lawfully
- be obtained only for one or more specified and lawful purpose(s)
- be adequate, relevant and not excessive in relation to those purposes be accurate, and where necessary, kept up to date.
- be kept for no longer than is necessary for those purposes
- be processed in accordance with the rights of the data subject
- be protected by appropriate technical and organisational security measures not be transferred abroad without adequate protection

All processing of personal data must be undertaken in accordance with the data protection principles of the Applicable Legislation. NSCs Information Security policies and procedures are designed to ensure compliance with the principles. NSC suppliers involved in the processing of personal data are required to adhere to Applicable Legislation.

Employees of NSC are responsible for ensuring that any personal data supplied by them to NSC is accurate and up-to-date.

All employees must complete all mandatory Data Protection and Information Security training annually or as directed from time to time.

2 Where we store personal data and how long for

Data is stored on on-site NSC servers, a Microsoft hosted SharePoint and Exchange Environment. Emails are archived through Claranet VitalMail. NSC also use a Pipedrive CRM system.

Unfortunately, the transmission of information via the internet is almost never completely secure. Although we will do our best to protect your personal data, we cannot guarantee the complete security of your data transmitted to our website or email systems; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

We will keep a copy of your personal data for as long as you remain registered with us and thereafter for such period as may be required for legal, audit and compliance purposes. If at any time after you are no longer registered with us you may request that your details are deleted from our CRM system, however you should be aware that if your details are deleted, this will mean we will have no record of any opting out that you may have requested and that you therefore may receive unsolicited communications in the future.

3 Uses and legal basis of our processing of data

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts entered into between you and us and fulfil related legal obligations;
- To enable communication between NSC staff with customers, suppliers (including prospective customers and suppliers) necessary to support our legitimate interests of promoting growing and developing our business. This includes supporting business development activities, delivery of services to our customers and general business management processes;
- To administer our website and for internal operations, including trouble shooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our website safe and secure.

4 Disclosure of information

Our general policy is not to disclose any personal data to a third party except with your prior consent. However, we may disclose your personal information to third parties:

- If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If NSC or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of business and other agreements; or to protect the rights, property, or safety of NSC, our customers, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5 Your rights

You have the right to ask us to amend inaccurate personal data or to delete it. However you should be aware that if you request your details to be deleted, this will mean we will have no record of any opting out that you may have requested and that you therefore may receive unsolicited communications in the future. If you send us any personal information in digital format, such as photographs, you are entitled to ask for a copy of this to be sent to you.

The Applicable Legislation gives you the right to verify whether we hold your personal data and (have) access your personal data. Any data access request may be subject to a reasonable fee to meet our costs in dealing with your request.

Our website may contain links to and from the websites, partner networks, clients, and/or affiliates. If you follow a link to any of these websites, please note that these websites are subject to their own privacy policies and that we do not accept any responsibility or liability for these sites and policies. Please check these policies before you submit any personal data to them.

6 Changes to our privacy policy

This policy may be updated by us from time to time, so please check this policy periodically to ensure you are aware of our latest policies.

7 Contact

Questions, comments, complaints and requests regarding this policy should be addressed to dataprotection@nsc.co.uk.