

## General Data Protection Regulation (GDPR) and the Data Protection Bill

### Employment Policy Statement

#### Purpose and Scope

1. This Policy Statement sets out Jurupa Resourcing Limited's (Jurupa, the Company) approach to HR-related data protection. It includes the Company's commitment to data protection, and individual rights and obligations in relation to personal data.

The Policy Statement applies to the personal data, referred to as HR-related personal data, of employees, workers, apprentices, trainees, freelance contractors, contract for service providers, and former employees. Jurupa maintains separate Privacy Notices in relation job applicants, and other personal data processed for business purposes.

2. Jurupa is committed to being transparent about how it collects and uses the personal data of employees of the Company, and to meeting its data protection obligations.
3. Jurupa has designated Aaron Davies, Founding Director, Jurupa, as the person with responsibility for data protection compliance. Questions about this Policy Statement, or requests for further information should be directed to Aaron who can be contacted via email at [adavies@jurupa.co](mailto:adavies@jurupa.co)
4. Jurupa will provide training to all individuals about their data protection responsibilities. This will include coverage as part of the new employee induction programme, and periodic briefings as part of the Company's internal communication arrangements.

Individuals whose job roles require regular access to personal data, or who are responsible for implementing this Policy Statement or responding to subject access request, will receive additional training to help them understand their duties and obligations, and how to comply with them.

#### Jurupa's data protection principles

5. Jurupa processes HR-related personal data in accordance with the following data protection principles -

- It processes personal data in a lawful, fair, and transparent manner
  - It collects personal data only for specified, explicit, and legitimate purposes
  - It processes personal data only where it is adequate, relevant, and limited to what is necessary for the purposes of processing
  - It keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay
  - It keeps personal data only for the period necessary for processing
  - It maintains appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and also accidental loss, destruction, or damage
6. Using Privacy Notices, Jurupa tells individuals about the legal basis and reasons for processing their personal data, and how it uses such data. The Privacy Notices will also set how personal data gathered during employment or engagement is held, together with the periods of time that the Company retains HR-related personal data.

Jurupa will promptly update HR-related personal data where an individual advises that the relevant information about them has changed or is inaccurate.

Importantly, where Jurupa processes special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with relevant additional safeguards as set out in the GDPR and the Data Protection Bill.

7. In accordance with the requirements of the GDPR, Jurupa maintains a record of its processing activities in respect of HR-related personal data.

## Individual rights

8. As a data subject, an individual has the right to make a subject access request. To make a subject access request, the individual should send the request via email to Aaron Davies, Founding Director, Jurupa, at [adavies@jurupa.co](mailto:adavies@jurupa.co)

In some cases Jurupa may need to ask the individual for proof of identification before the request can be processed. In such cases Jurupa will properly inform the individual and advise the type(s) of proof of identity needed.

9. Jurupa will normally respond to a subject access request within one month from the date it is received. The Company will write to the individual within one month of receiving the original request to advise if the response time will be extended to the maximum three months, together with an explanation for the permissible reason for the extended response period.

10. In response to a subject access request, Jurupa will tell the individual -

- Whether or not the individual's data is processed and if so why, the categories of personal data concerned, and the source of the data if it is not collected from the same individual
- To whom the individual's data is or may be disclosed, including to recipients outside the European Economic Area (EEA) and the safeguards that apply to such transfers
- For how long the individual's data is stored
- The individual's rights to rectification or erasure of data, or to restrict or object to processing
- The individual's right to complain to the Information Commissioner if they think Jurupa has failed to comply with their data protection rights
- Whether or not Jurupa carries out automated decision-making and the logic involved in any such decision-making

11. Jurupa will provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless the individual agrees otherwise.

If the individual wants additional copies, Jurupa will charge a fee based on the administrative cost of providing the additional copies.

12. If the subject access request is manifestly unfounded or excessive, Jurupa will not be obliged to comply with it. In these circumstances, the Company will notify the individual accordingly, including whether or not Jurupa will respond to the request.

Alternatively, and in light of the particular circumstances, Jurupa may decide to respond subject to payment by the individual of a fee that will be based on the administrative cost of responding to the request.

13. Jurupa will comply with all other rights that individuals have in relation to their personal data. These include the rights to -

- rectify inaccurate data
- stop processing or erase data that is no longer necessary for the purposes of processing
- stop processing or erase data if the individual's interests override Jurupa's legitimate grounds for processing data (where this is the reason for processing data)
- stop processing or erase data if processing is unlawful
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override Jurupa's legitimate grounds for processing data

To exercise any of these rights, the individual should send their request via email to Aaron Davies, Founding Director, Jurupa, at [adavies@jurupa.co](mailto:adavies@jurupa.co)

## Individual responsibilities

14. Individuals are responsible for helping Jurupa to keep their personal data up to date. Individuals should notify the Company if any personal data provided to Jurupa changes eg home address, bank details, etc.
15. Individuals may have access to the personal data of other individuals in the course of their employment or engagement with Jurupa. Where this applies, the Company requires such individuals to help it to meet its data protection obligations.
16. Individuals who have access to personal data are required -
  - To access only data that they have authority to access, and only for authorised purposes
  - Not to disclose personal data to individuals, whether inside or outside Jurupa, who have appropriate authorisation
  - To keep personal data secure, properly using all control and security arrangements
  - Not to remove personal data in any form or using any devices from Jurupa premises without authorisation and without adopting appropriate additional security arrangements
  - Not to store personal data on personal devices or in other insecure ways (eg local computer drives) that are used for work purposes

Failure to observe these requirements may amount to a disciplinary offence, which will be dealt with in accordance with the Jurupa disciplinary procedure. Significant or deliberate breaches of this Policy Statement (eg accessing personal data without a legitimate reason to do so and the appropriate authorisation) may constitute gross misconduct and could lead to dismissal without notice.

## Data Security

17. Jurupa takes the security of HR-related data seriously. The Company uses internal policies and controls to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed other than by employees in the proper performance of their duties with Jurupa.

Jurupa may transfer HR-related personal data to countries outside the EEA to enable the performance of a contract and including the legitimate interests of a third party. Such data is transferred outside the EEA on the basis of relevant additional safeguards, including binding contractual arrangements and due diligence tests, designed to ensure an adequate level of protection for the rights and freedoms of data subjects.

18. Where the Company engages third parties to process personal data on its behalf, such parties operate in accordance with the appropriate Jurupa control policies and arrangements, together with a duty of confidentiality and an obligation to implement appropriate technical and organisational measures to ensure the security of data.
19. Some of the processing that Jurupa carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, Jurupa will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals, and the measures that can be put in place to mitigate the identified risks.

## Data breaches

20. Jurupa will record all data breaches, regardless of their effect or assessed impact.
21. If Jurupa discovers that there has been a breach of HR-related personal data that poses a risk to the rights and freedoms of individuals, the Company will report it to the Information Commissioner within 72 hours of discovery.
22. If the data breach is likely to result in a high risk to the rights and freedoms of individuals, Jurupa will tell all such affected individuals that there has been a breach. Jurupa will also provide the affected individuals with information about its likely consequences and the mitigation measures it has taken.