

Labotek GB Limited

Data Protection Policy

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Data Protection Policy (inc Fair Processing Notice)
Owner
Mr R Hird
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For public or staff use
Website and staff
For any queries or assistance relating to this document
sales@labotek.co.uk Attn: UK Director

Summary

This policy sets out how all staff at Labotek GB Limited ('The Company') will ensure that professional, personal and sensitive personal data is dealt with correctly and securely and in accordance with the Data Protection Act 2018 ('The Act'), and other related legislation.

The UK Director acts as the representative of the data controller on a day to day basis and is responsible for providing advice and guidance to the company in order to implement this policy, monitor compliance with data protection law and develop related policies and guidance where possible. The company has nominated a designated person to be contacted internally in relation to all matters related to data protection issues: Mrs M Vincent email: mv@labotek.co.uk

The Data Protection Act 2018 establishes a framework of rights and duties which are designed to protect and enforce the privacy of personal data whilst also allowing for the lawful and appropriate use, sharing or transfer of this type of data.

The Act applies to anyone who processes data for their business. It covers all personal information regardless of its format or the way it is collected, used, recorded, updated, stored and destroyed.

The Act is underpinned by a set of eight principles. The Company is committed to following these eight principles as set out in this policy.

Personal data relates to a living individual who can be identified either by that data or along with other information likely to come into a person's possession. This will apply to staff, customers, business partners, and others who have contact with The Company.

Personal data also covers facts about the individual(s) as well as information regarding the intentions of The Company towards the individual(s).

Processed Fairly and Lawfully - The Company will inform staff, customers, business partners, and other data subjects why they need their personal data, how it will be used and whom it may be shared with. This will be done via the Privacy Notice on the website.

The Company will process personal data with regard to the conditions laid out in the Act and where appropriate consent will be sought. The Company will not do anything unlawful with the personal data.

Processed for Specified Purpose - Personal data held for these stated purposes will not be used for any other incompatible purpose without consent. In accordance with The Act, The Company is registered as a Data Controller with the Information Commissioner's Office and will renew this annually. The register is available to view here:
http://www.ico.org.uk/what_we_cover/register_of_data_controllers 5.

Adequate, Relevant and Not Excessive - The Company will endeavour to collect enough personal data that is sufficient for the purpose and will not ask for more information than is necessary. The Company will regularly review the information held and will check personal data already held for missing, irrelevant or seemingly excessive information.

Accuracy - Data held by The Company will be as accurate and up to date as is reasonably possible and steps will be taken to regularly check the accuracy of personal data held.

Data Retention - The Company will not keep personal data for longer than is necessary for the stated purpose(s). In order to ensure this, all information held and/or created by The Company or held on its behalf will be retained according to timescales set out here:

[Running a limited company: your responsibilities: Company and accounting records - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

The Company will ensure that all personal data deleted or physically destroyed is done in a secure and confidential way.

Rights of Data Subjects - The Company acknowledges that the Data Protection Act gives specific rights to any person whose details are held/processed by The Company, including the right to receive a copy of their own personal data. The Company will ensure clear procedures are in place to allow for this right of access, known as a Subject Access Request and will supply the information sought within the required 40 calendar days from date of written request

The rules of Data Protection apply equally to staff information as they do to customer data. Staff have a right to view information held by The Company about them.

Any third party data (information about someone other than the requesting individual) found will generally be removed or redacted unless third party permission to disclose is provided or it is reasonable in all circumstances to disclose it.

Technical and Organisational Security - To prevent unauthorised/unlawful processing and accidental loss, destruction of, or damage to personal data The Company will ensure appropriate security measures are in place to safeguard all personal data whether held in

paper files, on a computer system, laptop or on portable media storage devices. Paper records and portable media storage devices are locked away when not in use. Personal data held electronically is kept securely and is protected by passwords. The Company will avoid storing personal information on the hard drive of PCs or portable equipment and media. If it is necessary to take any of these assets outside of the premises environment they will be protected in transit, not left unattended and stored securely.

A deliberate breach of this Policy will be treated as disciplinary matter. The Company will ensure that any contractors who process personal information on our behalf will do so under strict written instruction and will have adequate protection in place to protect the information.

Transfers outside of Europe - The Company is unlikely to transfer any personal information outside of the European Economic Area (EEA), however, if this is necessary, checks will be made to ensure an adequate level of protection for that information, and consent will be sought from those affected.

Staff responsibilities:

To read, understand and comply with this Policy.

The prevention, detection and reporting of loss of data.

To notify our UK Director and Director as soon as possible if they believe or suspect that a conflict with this Policy has occurred or may occur in the future.

Any employee who breaches this Policy will face further action as described in our disciplinary procedures.

Individuals are encouraged to raise concerns about any instance or suspicion of malpractice as early as possible. If you are unsure whether a particular act constitutes data loss, or if you have any other queries, these should be raised with our UK Director.

Any breach of this Policy is likely to constitute a serious disciplinary, contractual and possible criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Labotek GB.

Labotek GB may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of us who are found to have breached this Policy.

Employees and other individuals acting for Labotek GB should note that The Company will provide all necessary assistance to the relevant authorities in any data loss position or breach to this policy.

Fair Processing Notice

The General Data Protection Regulations (GDPR) provides a framework for how organisations use personal information. It protects and enforces the privacy of personal information whilst also allowing for the lawful and appropriate use of this type of information about staff, customers, business partners, and others who have contact with The Company.

GDPR applies to many types of organisations who process personal information, and it covers all personal information regardless of its format or the way it is collected, used, recorded, updated, stored and destroyed. Personal information relates to an individual who can be identified by that information or along with other information likely to come into a person's possession.

The Company will inform staff, customers, business partners, and others why they need their personal information, how it will be used, with whom it may be shared and anything else required. This will be done via clear and easy to understand statements on forms and the Fair Processing Notice documents available on our website.

For the majority of personal information The Company's lawful basis for processing it is because it is necessary for business continuity. Where this is not the case, consent to use personal information will be sought from individuals. Where necessary, The Company will conduct Privacy Impact Assessments to ensure the processing of information does not pose a risk to the rights and freedoms staff, customers, business partners, and others.

The Company has stated data will not be used for any other purpose without first informing those individuals whose information it is. In accordance with UK law The Company is registered as a Data Controller with the Information Commissioner's Office and we will renew this annually.

The Company will only collect and store personal information that is sufficient for the purpose we have stated; we will not ask for more information than is necessary. The Company will regularly review its forms and will check personal information already held for missing, irrelevant or seemingly excessive information.

Information held by The Company will be as accurate and up to date as is reasonably possible and steps will be taken to regularly check the accuracy of personal information held. If a staff, customer, business partner or others, informs The Company of a change of circumstances or

an error in their personal information it will be reviewed and updated as soon as is practicable.

Retention; The Company will not keep personal information for longer than is necessary for the stated purpose(s). In order to ensure this, all information held and/or created by The Company or held on its behalf will be retained according to timescales set out here:

[Running a limited company: your responsibilities: Company and accounting records - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/running-a-limited-company-your-responsibilities-company-and-accounting-records)

The Company will ensure that all personal information deleted or physically destroyed is done in a secure and confidential way. To prevent unauthorised or unlawful processing and to protect against accidental loss, destruction or damage to personal information, The Company will ensure adequate security measures are in place to safeguard all personal information whether held in paper files, on a computer system, laptop/tablet or on portable media storage devices. Paper records and portable devices are locked away when not in use. Personal information held electronically is kept securely and is protected by passwords. Where it is necessary to store or transport personal information on a portable device such as a laptop/tablet or other storage device the relevant equipment or portable media will always be encrypted.

Your data will not be shared or stored outside of the UK without added adequate protection.

The information we collect, use, and store includes names and contact details of all relevant parties within our customers and suppliers, business address and business financial information ie accountants' names and address if relevant, registered office address, limited company information, bank account and VAT information.

If we are required, by law, to pass certain information about our customers, for example if a debt collection agency is required, this will only take place where legislation allows it to do so, and it is in compliance with the Data Protection law. Decisions on whether to follow this route will be held in accordance to the advice here:

[Options if you're owed money - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/options-if-youre-owed-money)

We will use your business information as follows:

Our Financial system Sage to process invoices, credit notes, financial data. Please see their Privacy Notice here:

[Sage privacy notice | Sage UK](https://www.sage.co.uk/privacy-notice)

Microsoft Office Suite to record business address, name, telephone numbers, emails, costings. Please see their Privacy Notice here:

[Microsoft Privacy Statement – Microsoft privacy](#)

UPS shipping company to transfer goods from one address to another using company name, address, contact name. Please see their Privacy notice here:

[Microsoft Privacy Statement – Microsoft privacy](#)

Labotek EU are our sister companies and company information may be shared in order to seek best value for our customers. To arrange deliveries, we will share business name, address and contact details. Please see their privacy notice here:

[Privacy policy \(labotek.com\)](#)

We may use your business information for our success stories on our Website, LinkedIn, our Newsletter, or Instagram. Specific consent will be made for any information sharing.

Your rights under Data Protection law allows an individual to ask The Company for copies of the information we hold about them or their children. If you would like more information about this please contact Mr R Hird, UK Director at our business address. If at any point you believe the information we hold is inaccurate or you have concerns about our use of it, please let us know.

Consent

By completing our New Customer documentation, you acknowledge that consent is required and agreed for us to hold the information you provide.

If you are not satisfied with our response or you believe we are not processing your personal data in accordance with Data Protection law you can complain to the Information Commissioner's Office (ICO):

<https://ico.org.uk/global/contact-us/> 0303 123 1113