



Company Data Protection Policy

Introduction

Adman Ltd is committed to following procedures to ensure that all employees, contractors, clients, consultants and other interested parties who have access to any personal information held by us or on behalf of us are fully aware of and abide by their duties and responsibilities under the Data Protection Act.

Statement of Policy

We need to collect and use information about people with whom we work in order to carry out our business and provide our services. These may include members of the public, current, past and prospective employees, clients, customers and suppliers. In addition, we may be required by law to collect and use information. All personal information, whether in paper, electronic or any other format, must be handled and managed in accordance with the Data Protection Act.

Data Protection Principles

We fully support and comply with the EU General Data Protection Regulation (GDPR) and the six principles of the Data Protection Act. In summary, this means personal information must be:

- (i) processed fairly and lawfully and in a transparent manner
- (ii) collected for specified, explicit and legitimate purposes
- (iii) adequate, relevant and limited to what is necessary
- (iv) accurate and where necessary kept up to date
- (v) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which those data are processed
- (vi) processed in manner that ensures appropriate security of the personal data

Accountability is central to GDPR. Data Controllers are responsible for compliance with the principles and must be able to demonstrate this to data subjects and the regulator- the Information Commissioner's Office (ICO).

Our purpose for holding personal information, along with a description of the categories of people and organisations to which we may disclose it, are defined within company internal procedures and employee handbooks.

Data Protection Principles

Strict conditions apply to the disclosure of personal information both internally and externally. We will not disclose personal information to any third party unless we believe it is lawful to do so. Respect to confidentiality will be given where appropriate. In certain circumstances, information relating to staff acting in a business capacity may be made available provided:

- We are required by law to do so
- The processing is necessary for the performance of a business task that the company has to carry out to perform their business/service.
- The member of staff has consented to the disclosure.
- the information is in a form that does not identify individual employees.

Handling of Personal Information

All staff will, through appropriate training and responsible management:

- fully observe conditions regarding the fair collection and use of personal information.
- meet our legal obligations to specify the purposes for which personal information is gathered and used.
- collect and process appropriate personal information only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements.
- ensure the accuracy and quality of personal information used.
- where possible pseudonymise or anonymise personal identifiers within information held
- apply strict checks to determine the length of time personal information is held
- ensure that the rights of people about whom information is held can be fully exercised under the Act
- take appropriate technical and organisational security measures to safeguard personal information
- Be responsible and able to demonstrate compliance with all of the above.

Compliance

Adman Ltd will ensure that;

- A Data Protection Officer is appointed within the company who has specific responsibilities for Data Protection.
- Our purposes for processing personal data are clearly set out and all subject access requests will be dealt with in accordance with the Data Protection Act.
- That ICO and Cyber certification is assessed, maintained and certified.
- Staff are reminded at intervals of their obligations and provided Data Protection Act related training.

- Everyone managing and handling personal information is appropriately trained to do so and everyone handling managing and handling personal information is appropriately supervised.
- Anyone wanting to make enquiries about handling personal information know what to do and queries about handling personal information are promptly and courteously dealt with.
- Methods of handling personal information are clearly described and a review/audit is made of the way personal information is managed.
- Methods of handling personal information are regularly assessed and evaluated.
- A system is maintained to record what personal information assets are held, how they are processed, maintained and managed.

To assist in achieving compliance, Adman Ltd have;

- An appointed HR/Data Protection Officer responsible for monitoring compliance, providing advice and guidance; dealing with any escalated complaints from data subjects; liaising with the ICO and company Directors and others on data protection issues and ensuring that staff have assistance to adhere to this policy and undertake relevant training and awareness.

Staff Responsibilities

All staff have a responsibility to protect the personal information held by the Department. They will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure and in particular will ensure that:

- they are appropriately trained in the handling of personal information
- paper and electronic records or documents containing personal/sensitive data are kept secured.
- personal data held on computers, mobile devices and computer systems is protected by individual strong passwords which, where possible, have forced changes periodically. Access controls should also be placed on electronic records containing personal and sensitive information

If and when, as part of their responsibilities, staff collect information about other people, they must comply with the guidance set out in our Data Protection training and no one should disclose personal information outside this guidance or use personal data held about others for their own purposes.

Third Party Users of Personal Departmental Information

Any third parties who are users of personal information supplied by Adman Ltd will be required to confirm and demonstrate that they will abide by the requirements of the Data Protection Act. There will be an expectation that these parties will audit their compliance with the Data Protection Act.

Policy Awareness

A copy of this policy statement will be given to all new members of staff and interested third parties. Existing staff and any relevant third parties will be advised of the policy. All staff and relevant third parties must be familiar with and comply with this policy at all times.

Martin Grimes

Date: 01/04/2022

Martin Grimes – Director

Adrian McCrory

Date: 01/04/2022

Adrian McCrory - Director

4 Bankmore Way East, Doogary, Omagh, County Tyrone, BT79 0NZ

+44 (0) 28 8224 2166, mail@adman-ltd.com , www.adman-ltd.com