

1.0 STATEMENT OF POLICY

It is **TNG Consulting Engineers Limited's** policy to comply with the Data Protection Act 2018, and General Data Protection Regulations (GDPR), to ensure our Customers, Clients, Suppliers and Employees can entrust us to use their data fairly and responsibly. We take a risk-based approach to data protection and recognise everyone's right to have control over their own identity and their interactions with others.

Good data protection practices help to remove unnecessary barriers to trade and co-operation. GDPR sets common standards that enable the free flow of data across borders. Good practice builds public trust in, engagement with, and use of data, in society and both the public and private business sectors.

2.0 SCOPE

GDPR requirements apply to UK residents' personal data and anyone in TNG that processes that information.

3.0 KEY TERMS

TNG Consulting Engineers recognises the following roles and terms:

PERSONAL DATA	Paper or digital information about a particular person who may include a customer, client, employee, partner, member, supporter, business contact, public official or member of the public. Data does not need to be 'private' information – even information which is public knowledge can be personal data. As can anonymous information which could still identify someone from the details, or by combining it with other information.
PROCESSING	The collection, recording, storing, using, analysing, combining, disclosing or deleting data.
DATA 'CONTROLLER'	The person (organisation) that decides how and why to collect and use the data, in this case TNG Consulting Engineers Limited. The 'Controller' is required to make sure that the processing of data complies with data protection law.
DATA 'PROCESSOR'	A separate person or organisation (not an employee) who processes data on behalf of the controller and in accordance with their instructions.
'DATA SUBJECT'	The individual person whom personal data is about.
THE ICO	The supervisory authority for data protection in the UK.

4.0 DATA PROTECTION PRINCIPLES

Within GDPR there are six principles for data processing, as well as accountability (which is also a principle but addressed slightly differently). TNG's commitment to meeting these principles is as follows:

i. **LAWFULNESS, FAIRNESS AND TRANSPARENCY**

- The processing of personal data shall be lawful and shall be based on the purpose and relationship with the individual.
- TNG shall only handle personal data in ways that people would reasonably expect, and not use it in ways that have unjustified adverse effects on them.
- TNG shall be clear, open and honest with people from the start about who it is, and how and why it uses their personal data.

ii. **PURPOSE LIMITATION**

TNG shall:

- clearly identify its purpose or purposes for processing data and shall document them.
- include details of its purposes in our privacy information for Clients, Colleagues, Suppliers and Employees.
- regularly review our processing and, where necessary, update our documentation and our privacy information for individuals.
- check that personal data is compatible with our original purpose, or, collect specific consent to use it for a new purpose.

iii. **DATA MINIMISATION**

TNG shall ensure the personal data processed is:

- **adequate** – sufficient to properly fulfil our stated purpose;
- **relevant** – has a rational link to that purpose; and
- **limited to what is necessary** – not hold more data than needed for purpose.

iv. **ACCURACY**

TNG shall:

- take all reasonable steps to ensure the personal data held is not incorrect or misleading. Data shall be regularly reviewed by a suitable person. If any errors are found, TNG shall take reasonable steps to correct or erase it as soon as possible;
- update personal data if there is a legitimate reason based on its intended use;
- carefully consider any challenges to the accuracy of personal data.

v. **STORAGE LIMITATION**

In all instances, TNG shall:

- understand what personal data it holds and why it is needed;
- maintain a Register of personal data information that shall include retention periods;
- regularly review information, and erase or anonymise data when no longer needed;
- have appropriate processes in place to comply with individuals' requests for erasure under 'the right to be forgotten';
- clearly identify any personal data that it needs to keep for public interest, archiving, scientific or historical research, or statistical purposes when applicable.

vi. **INTEGRITY AND CONFIDENTIALITY (SECURITY)**

TNG shall ensure that it has appropriate security measures in place to protect the personal data held. This shall include:

- limited permitted access to personal data;
- password protection and encryption on IT systems and electronic data;
- back up of all paper and electronic data.

ACCOUNTABILITY

- TNG shall take full responsibility for what it does with personal data and how it complies with the six principles above.
- TNG shall have appropriate measures and records in place to be able to demonstrate its compliance.

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5.0 **DATA SUBJECT RIGHTS**

TNG recognises and endows individuals with eight 'data subject' rights. It shall produce Privacy Information for Clients, Suppliers and Employees, and utilise its website, contract documents, and Staff Handbook to communicate the Privacy Notices and shall ensure that they are met. Privacy Information shall include:

- i. The right to be **informed**;
- ii. The right of **access**;
- iii. The right to **rectification**;
- iv. The right to **erasure**;
- v. The right to **restrict processing**;
- vi. The right to **data portability**;
- vii. The right to **object**;
- viii. Rights in relation to **automated decision making and profiling**.

