

Data Protection Policy & Procedure

Version:	Changes:	Date:	Made by:	Review date
V.019a	Initial version	May 2019	Diane McGhee	May 2022
V.022a	Reviewed, language sampled, meaning remains unchanged	May 2022	Diane McGhee	May 2024
V.023a	Reviewed, inclusion of change table at front of document	Jan 23	Diane McGhee	January 2025
V.024a	Reviewed, paragraph 7.b sentence included for permanent removal of data	Aug 24	Diane McGhee	August 2026

Data Protection Policy & Procedure

1. Data protection principles

Quelltex is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

Data Protection Policy & Procedure

- a. This policy applies to all personal data processed by Quelltex.
- b. The Responsible Person shall take responsibility for Quelltex's ongoing compliance with this policy.
- c. Quelltex shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. Individuals have the right to access their personal data held by Quelltex and any such requests made to Quelltex shall be dealt with in a timely manner. Requests can be made to our Data Controller:
diane@quelltex.co.uk

4. Lawful purposes

- a. All data processed by Quelltex must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. Quelltex shall check the appropriate lawful basis of each piece of data presented to one of our team (this check can be a mental checklist of the person receiving the data, or can be referred back to the office to for checking with our data controller).
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Quelltex's systems.

Data Protection Policy & Procedure

5. Data minimisation

- a. Quelltex shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. Quelltex shall take reasonable steps to ensure personal data is accurate and will update immediately any errors they are made of by the relevant personnel.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Quelltex has an archiving process for each area in which personal data is processed and review this process regularly.
- b. The archiving process considers what data should/must be retained, for how long, and why. Permanent removal of all unnecessary data is undertaken regularly

8. Security

- a. Quelltex shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

Data Protection Policy & Procedure

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Quelltex shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

Managing Director: Paul Quellin

Document prepared 7th May 2019

Next revision: 7th May 2021

Document revise: 2nd June 2021 by D McGhee

3.a Removal of unnecessary words and addition of immediate contact details.

4.b Removal of the term '...Note in register of systems', to more accurate '... check the appropriate lawful basis of each piece of data presented...'

Next revision: May 2023