

## Crystal&Co Data Protection Policy and Procedure

### Introduction

Crystal&Co. is committed to protecting the privacy and security of personal data in line with the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR). We collect and process personal data in a fair, lawful, and transparent manner, ensuring that the information is accurate, used appropriately, and retained only as long as necessary.

This policy outlines the steps Crystal&Co. will take to safeguard personal data, ensuring that all employees and service providers are aware of their responsibilities in handling such data. The procedures included reflect our commitment to maintaining high standards of data security.

### Aims and Purpose

The purpose of this Data Protection Policy is to ensure that:

- Personal data is processed fairly, lawfully, and transparently.
- Personal data is collected for specified, legitimate purposes and not processed in ways incompatible with those purposes.
- Personal data is accurate, relevant, and limited to what is necessary.
- Personal data is kept secure, both digitally and in hard copy.
- Data subjects are aware of their rights and can exercise them accordingly.

### Scope

This policy applies to all employees, contractors, and partners of Crystal&Co. who handle personal data in the course of their work. It covers all personal data held in electronic formats (including data stored in OneDrive) and hard copies (including documents placed in secure consoles for shredding by an external company).

### Data Protection Principles

- Crystal&Co. adheres to the following principles in accordance with the UK Data Protection Act 2018 and GDPR:
- **Lawfulness, Fairness, and Transparency:** Personal data must be processed lawfully, fairly, and transparently. Crystal&Co. will always inform individuals of why and how their data is being collected, and for what purpose.
- **Purpose Limitation:** Personal data will only be collected for specified, legitimate purposes and will not be further processed in a way that is incompatible with those purposes.
- **Data Minimisation:** Crystal&Co. collects and processes only the personal data necessary for legitimate purposes, minimizing the scope of information collected.

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- **Accuracy:** All personal data will be kept up to date and inaccuracies will be corrected promptly.
- **Storage Limitation:** Data will not be retained longer than necessary. For NVQ assessments, data may be held for a statutory period as required by the relevant awarding bodies, after which it will be securely deleted.
- **Integrity and Confidentiality:** Personal data will be processed in a manner that ensures its security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.
- **Accountability:** Crystal&Co. is responsible for and must be able to demonstrate compliance with these principles.

## **Procedures**

### **1. Data Collection**

Crystal&Co. will collect personal data for the following purposes:

- NVQ qualifications and training registration.
- Communication with clients, candidates, and employees.
- Employee management.
- Compliance with legal and regulatory obligations.

Personal data collected may include:

- Name, address, phone number, and email address.
- Date of birth, National Insurance number, and CSCS/CPCS numbers.
- Qualification and employment records.

All data collection will be done with explicit consent and individuals will be informed of the purpose of data collection.

### **2. Data Storage**

#### **Digital Data Storage:**

- Data will be stored securely in OneDrive, with controlled access to ensure only authorized personnel can access it.
- Full backups of data will be conducted bi-weekly, and access to backups will be restricted to authorized individuals.

#### **Hard Copy Data Storage:**

Hard copies of personal data will be placed in secure consoles. An external shredding company will collect and shred the documents, providing a certificate of shredding.

### **3. Data Processing**

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Crystal&Co. will process data only for the purposes outlined and will ensure that data subjects are aware of how their data is being used. This includes the use of data for registering candidates, managing assessments, communicating with clients, and other operational needs. Data will not be shared with third parties unless legally required or with the consent of the individual.

#### 4. Data Access

Individuals have the right to access the personal data Crystal&Co. holds about them. Requests for access should be made in writing to the Data Protection Officer.

#### 5. Data Retention and Disposal

Data will be retained for the duration necessary to meet business and legal requirements. After this period:

- Digital data will be deleted from OneDrive in accordance with retention schedules.
- Hard copies will be shredded through the secure shredding service, with certification retained as proof of destruction.

#### 6. Data Breach Notification

In the event of a data breach, Crystal&Co. will:

- Notify the affected individuals and the Information Commissioner’s Office (ICO) where required.
- Take immediate steps to mitigate the breach and prevent further occurrences.

#### 7. Training and Awareness

All employees will receive annual training on data protection regulations and procedures to ensure compliance with this policy.

#### 8. Responsibilities

##### Data Protection Officer (DPO):

- Oversees the implementation of data protection policies.
- Ensures compliance with the UK Data Protection Act 2018 and GDPR.
- Manages data subject requests, data breaches, and provides guidance on data handling.

##### Employees:

- Ensure they process personal data in compliance with this policy.
- Report any potential data breaches to the DPO.

#### 9. Data Transfers

Personal data will not be transferred outside the European Economic Area (EEA) without proper safeguards, and any data transfers will comply with UK data protection laws.

### **Compliance and Monitoring**

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Crystal&Co. will regularly monitor its compliance with this policy through internal audits and will review the policy annually to ensure it remains effective and compliant with any changes in data protection laws.

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### Contact Information:

For any queries or to exercise your data protection rights, please contact our Data Protection Officer:

- Maria Dinu
  - Maria.dinu@crystalandco.co.uk
  - 07762481422
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### Approval

The undersigned certifies that this policy has been reviewed and approved for implementation within Crystal&Co.

### Managing Director

**Signature:** .....*Ramona Marcu*.....

**Name:** Ramona Marcu

**Date:** 02/09/2024

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