



# Data Protection Policy /

**Policy Scope:** This policy relates to all employees, subcontractors, consultants and partners.

Novus Property Solutions Ltd. (the Company) comply with the requirements of the General Data Protection Regulation (GDPR) by following procedures to ensure that all data users who have access to any personal data held by or on behalf of the Company are fully aware of and abide by their duties under the GDPR.

To perform our business, Novus needs to collect, store and use information about 'people'. 'People' include members of the public, current, past and prospective employees, customers and suppliers, collectively referred to as data subjects. This personal data will be handled according to the GDPR irrespective of how it is collected, recorded and used and whether present on paper, in computer records or recorded by other means.

At Novus, we regard the lawful and appropriate treatment of personal information as important to our successful operations, reputation and as essential to maintaining confidence between us and those with whom we carry out business. We therefore fully endorse and comply with the Principles of the GDPR.

## Handling Personal Data

Through management and use of appropriate controls, Novus and our employees commit to:

1. Using personal data in the most efficient way.
2. Collecting and processing the data or information which is needed, and no more.
3. Using personal data as described on collection, or for purposes which are legally permitted.
4. Ensuring personal data is accurate and remains current.
5. Retaining personal data for no longer than is necessary.
6. Securely destroying personal data which is no longer needed.
7. Adopting appropriate technical and organisational measures to safeguard personal data.
8. Ensuring that personal data is not transferred outside the European Union without suitable safeguards
9. Making information available to data subjects of their rights to access personal data
10. Ensuring that the following rights of data subjects can be fully exercised:
  - a. to be informed
  - b. to provide access to personal information
  - c. to request rectification
  - d. to request erasure
  - e. to restrict processing in certain circumstances
  - f. to data portability
  - g. to object to processing

## Data Protection Principles

Processing of personal data will comply with six principles of good practice. Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected for specified, explicit and legitimate business purposes and not further processed or stored in a manner that is incompatible with those purposes;
3. Limited at point of collection to what is necessary for the specified business purpose.



4. Accurate and up to date, with reasonable steps taken to erase personal data that is inaccurate.
5. Kept for no longer than is necessary and only for the stated business purposes.
6. Kept private, with protection against unauthorised processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### Sensitive Personal Data

The Company holds limited amounts of Sensitive Personal Data which has been identified and will be subject to the special processing stipulated by the GDPR.

The characteristics which classify a piece of data sensitive are:

- a) Racial or ethnic origin
- b) Political opinion
- c) Religious/philosophical beliefs
- d) Trade union membership
- e) Physical or mental health or condition
- f) Sexual life or sexual orientation
- g) Biometric data

### Responsibilities

All staff are responsible for ensuring that the minimum standards established within this policy are adhered to in line with their specific role and responsibilities.

The Company Board devolves responsibility for policy execution to the Departmental Managers, Head of Operations and Operations Managers who must apply the Data Protection procedures. The Data Protection Officer (DPO) will assist these managers in procedure application and business process revision that involves personal data. The DPO will periodically monitor policy compliance through internal audit.

**This policy does not give contractual rights to individual colleagues.**

Authorised by

  
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 (CEO)

### Document History

Version	Issue Date	Review Date	Author	Comments
0	31 <sup>st</sup> July 2019	31 <sup>st</sup> July 2020	Neil Washington	New policy following company review
A	20 <sup>th</sup> Nov 2019	20 <sup>th</sup> Nov 2020	Alan Nixon	This policy does not give contractual rights to individual colleagues. Added.



## Appendix A: Procedures

Ref & Status	Document	Owner
	<u>Policy (=what)</u>	
DPPOL09	Data Protection Policy	Data Protection Officer
	<u>Procedures (=how)</u>	
DPPOL09-1	GDPR Training & Awareness	Head of People Services
DPPOL09-2	Information Audit (Master Data Survey)	Data Protection Officer
DPPOL09-3	Data Subject Rights 01 – Right to be informed 02 – Subject Access Requests 03 – Right to Rectification 04 – Right to erasure 05 – Right to restrict processing 06 – Right to data portability 07 – Right to object	Data Protection Officer
DPPOL09- 4	Impact Assessment	Non Executive Director
DPPOL09- 5	Data Subject Consent	Non Executive Director
DPPOL09- 6	Supply Chain	Finance Director
DPPOL09 -7	Privacy Statements	Data Protection Officer
DPPOL09- 8	Data Breach	IT Infrastructure Manager
DPPOL09-9	Complaints	Data Protection Officer
NPS-CSP 012	Management of Company Records	Finance Director



## Appendix B: Forms

- [C.1] Consent Form
- [C.2] Consent Withdrawal Form
- [C.3] Parental Consent Form
- [C.4] Parental Consent Withdrawal Form
- [C.5] Data Subject Request Form
- [C.6] Privacy Statement Template

The above forms are held by the relevant department



## Appendix C – IT Hosting Platforms

System	Personal Data	Hosted
Approbo	None	France
CapturePoint	None	Germany
Novus Forum	Name / Job title / work contact details	On Premise
Client Portals	Open File Structure	European Union
Coins		On Premise
Flexit	Name / entitlement / holidays	On Premise
Impact		UK
Novus Expense		France
Novus Link		European Union
Novus Surveys	Dependant on Questions set	On Premise
PCard Convertor	None	On Premise
People HR	To be collated by People Services	UK
Price Control Database	None	On Premise
Problem Invoice Workbench	None	On Premise
Profit by Worktype	None	On Premise
Projections	None	On Premise
QS Cost Cube	None	On Premise