

**KEELAGHER OKEY KLEIN**  
**Data Protection Policy**

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**Introduction**

Keelagher Okey Klein is fully committed to compliance with the requirements of the General Data Protection Regulations, which came into force on the 25<sup>th</sup> May 2018. We will therefore follow procedures that aim to ensure that all employees, contractors, agents and consultants who have access to any personal data held by or on behalf of ourselves, are fully aware of and abide by their duties and responsibilities under the Act.

**Statement of policy**

In order to operate efficiently, Keelagher Okey Klein has to collect and use information about people with whom it works. These may include current, past and prospective employees, clients and customers, and suppliers. This personal data must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

Keelagher Okey Klein regards the lawful and correct treatment of personal data as very important to its successful operations and to maintaining confidence between ourselves and those with whom it carries out business. Keelagher Okey Klein will ensure that it treats personal data lawfully and correctly.

To this end, Keelagher Okey Klein fully endorses and adheres to the Principles of Data Protection as set out in the General Data Protection Regulations.

**The principles of data protection**

The Regulation stipulates that anyone processing personal data must comply with **Six Principles** of good practice. These Principles are legally enforceable.

The Principles require that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject;
2. 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, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

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4. 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 with delay;
5. 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 accordance with Article 89(1) subject to implementation of the appropriate technical and organisation measures required by this Regulation in order to safeguard the rights and freedoms of the data subject.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing against accidental loss, destruction or damage, using appropriate technical or organisational measures.

**Lawful basis for processing personal data (Article 6 of GDPR)**

- a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- b) Contract: the processing is necessary for a contract you have with the individual or entity, or because they have asked you to take specific steps before entering into a contract.
- c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- d) Vital interests: the processing is necessary to protect someone's life.
- e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

**Handling of personal data**

Keelagher Okey Klein will, through appropriate management and the use of strict criteria and controls:-

- Observe fully conditions regarding the fair collection and use of personal information;
- Meet its legal obligations to specify the purpose for which information is used;
- Collect and process appropriate information and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements and for the purposes shown on our **Privacy Notice** (which can be found at <https://kok-surveyors.co.uk/policies/>);
- Ensure the quality of information used;
- Apply strict checks to determine the length of time information is held;

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- Take appropriate technical and organisational security measures to safeguard personal information;
- Ensure that personal information is not transferred abroad without suitable safeguards;
- Ensure that the rights of people about whom the information is held can be fully exercised under the Regulations.

These include:

- The right to be informed that processing is being undertaken;
- The right of access to one's personal information;
- The right to prevent processing in certain circumstances;
- The right to correct, rectify, block or erase information regarded as wrong information.

In addition, Keelagher Okey Klein will ensure that:

- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice;
- Everyone managing and handling personal information is appropriately trained to do so;
- Everyone managing and handling personal information is appropriately supervised;
- Anyone wanting to make enquiries about handling personal information, whether a member of staff or a member of the public, knows what to do;
- Queries about handling personal information are promptly and courteously dealt with;
- Methods of handling personal information are regularly assessed and evaluated;
- Performance with handling personal information is regularly assessed and evaluated;
- Data sharing is carried out under a written agreement, setting out the scope and limits of the sharing. Any disclosure of personal data will be in compliance with approved procedures.

All staff 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:

- Paper files and other records or documents containing personal/sensitive data are kept in a secure environment;
- Personal data held on computers and computer systems is protected by the use of secure passwords, which where possible have forced changes periodically;
- Individual passwords should be such that they are not easily compromised.

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All contractors, consultants, or others working with Keelagher Okey Klein must:

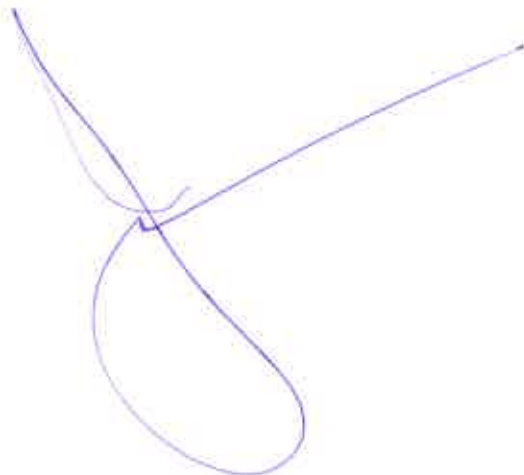
- Ensure that they and all of their staff who have access to personal data held or processed for or on behalf of the Keelagher Okey Klein, are aware of this policy and are fully trained in and are aware of their duties and responsibilities under the Regulations. Any breach of any provision of the Act will be deemed as being a breach of any contract between Keelagher Okey Klein and that individual, company, partner or firm;
- Allow data protection audits by Keelagher Okey Klein of data held on its behalf (if requested);
- Indemnify Keelagher Okey Klein against any prosecutions, claims, proceedings, actions or payments of compensation or damages, without limitation.

All contractors who are users of personal information supplied by Keelagher Okey Klein will be required to confirm that they will abide by the requirements of the Regulations with regard to information supplied by ourselves.

**Notification to the Information Commissioner**

GDPR states that in the case of a personal data breach, the data controller shall without undue delay and, where feasible, no later than 72 hours after having become aware of it, notify of the personal data breach to the supervisory authority (ICO) competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

In the extremely rare event of a serious data breach, any staff, contractors, consultants or any others working for Keelagher Okey Klein must inform the Managing Director, who will then notify the Information Commissioners Office (ICO) as appropriate and in accordance with the Regulations.

A handwritten signature in blue ink, appearing to be 'J. F. Okey', is written over a faint, light blue circular watermark or stamp.

J. F. Okey (Director)