



# Data Information Control Process GDPR Compliance

## **Introduction**

Sunter Limited is a construction company based in Hetton-le-Hole that specialises in the regeneration of Social Housing for Local Authorities and Housing Associations across the NE of England.

Established in 1973 as Sunter Brothers and becoming a limited company in 1999, changing its name to Sunter Limited.

With regards to the secure management of information, Sunter Limited has developed and implemented many policies and procedures enabling the company to carry out its undertakings as required and to safeguard all information attained from relevant parties.

## **Purpose**

The purpose of this policy is to ensure that all data requested, attained and stored by Sunter Limited is done so in a safe and methodical manner.

Sunter Limited are required to keep data on file for the purposes of employment of individuals and contractors, the procurement of materials, the management of contracts and financial aspects associated with the company undertakings.

Only Managers with Director approval will be allowed to access the data that is stored either electronically or hard copy.

This policy is also devised to comply with the GDPR Regulations and any accompanying ACOP or legislation.

## **Scope**

Sunter Ltd will enforce this written Policy on security of information. This Policy will be passed onto any managers who have access to confidential information, whether the information is internal to Sunter Ltd or from an external means (Clients, Suppliers, Customers and/or any other).

Sunter Ltd will ensure confidentiality, integrity and availability of information created, received, maintained or transmitted. Protect against any reasonably anticipated threats or hazards to the security or integrity of such information. Protect against any reasonably anticipated uses or disclosures of such information that are not permitted or required.

This Policy is reviewed annually and/or after any alteration to legislation, breach of the Policy and/or any other reason deemed fit to improve on the security of the Policy and/or information held by the company.

## **Background**

Information and data is essential to the daily planning, running and implementation of the companies undertakings. All data and information that is required to be kept by the company is done so with the full knowledge of the provider (Client, Customer, Supplier, Employee).

All information is classed as sensitive and is therefore controlled in-house by the data processor who cascades roles and responsibilities to the data controller and other managers.

The data-processors for the company are the Directors

The data-controller for the company is the Health & Safety Manager

Information that is deemed sensitive or a potential risk to the security of the Company or others includes:

- Employee & Contractor Information
- Customer Information
- Client Information
- Supplier Information

The following table indicates the type of information stored by Sunter Limited for the above list.

Employees & Contractors	Customers	Clients	Suppliers
Names	Names	Names	Contact Details
Addresses	Addresses	Addresses	Agreed Prices
Contact Details	Contact Details	Banking Details	Any other information
Medical Issues	Medical Issues	Contact Details	
Bank Details	Safeguarding Issues	Employees details	
	Any other information	Any other information	

The above list is not exhaustive and may be amended without prior notice. Any amendments will be passed on as soon as possible to the relevant persons.

All information gathered in the formulation of sites and contracts is deemed as confidential and all employees are required to treat the information as so.

As so, all information must only be viewed and passed onto the relevant persons within the company.

### **Information & Data Storage**

Information kept by Sunter Limited on sites and contracts are kept in two main forms, electronic and hard copy. To ensure security of this information, the following measures have been implemented.

Electronic Information – is kept on the Company Computer Server as well as a back-up to a secure Cloud Based System. These are password protected and users of the Company Internal Intranet are restricted into which files they can access.

An external IT provider manages the security of the system and ensures that all back-up is completed safely.

Hard Copy Documents – are kept at head office. Access to head office is via an electronic keypad system to which there is restricted access. Personnel who have access to the head office area are office based employees who require access to confidential and sensitive information as part of their daily work.

### **Destruction of Data**

Any information that is no longer required to be kept by the company will be destroyed.

- Employee & Contractors Data  
All electronic data stored on employees will be wiped from the company server  
All hard copy data will be destroyed by shredding and secure destruction of shredded documents
- Customer, Client and Supplier Data  
All electronic contract data and customer details including email communications will be removed from the company server once deemed as not required  
All hard copy data will be destroyed by shredding and secure destruction of shredded documents.

### **Data Sharing**

All information stored by Sunter limited for use in its daily activities will not be shared to any third party outside the company without the written permission of the individual / group of whom the information is about.

### **Roles & Responsibilities**

Individuals within the organisation that will require access to information stored include:

- Directors (Data-Processor)  
Sunter Limited Directors have the overall responsibility of the company and ensure that all policies and processes regarding the procuring, storage and sharing of data is adequately controlled at all times.
- Health & Safety Manager (Data-Controller)  
The data-controller ensures that all data attained by the company is stored securely and is only accessible to individuals with clearance. He also ensures that documents and other data are monitored and internally reviewed to ensure compliance with all legislation.
- Management Accountant  
The management accountant deals with wages and other financial aspects of the company. He has direct access to individual files and is aware of the processes in place regarding the protection of all data accessed
- Administration Manager  
The administration manager has access to all types of files and he is aware of the processes in place regarding the protection of all data accessed
- Stores Manager  
The Stores Manager has access to suppliers details for procurement purposes. He is aware of the processes in place regarding the protection of all data accessed

All members of staff who knowingly passes on or allows access to any information held by the company will be liable to instant dismissal as this will be construed as Gross Misconduct, and may also face potential criminal proceedings either from Sunter Ltd, clients, customers etc.

## **Sunter Limited, Mission, Business Direction & Quality Statements**

### **SUNTER LTD MISSION STATEMENT**

'At Sunter Limited we constantly strive to achieve a culture of excellence, maintaining a high standard of workmanship: leading the way forward with a level of service and commitment that will continue to develop relationships with both new and existing clients'.

### **SUNTER LTD BUSINESS DIRECTION**

Sunter Limited's aim is to monitor and improve its performance, and is committed to achieving this by:

- Continuing to meet customer expectations and wherever possible exceed them.
- Training and developing of local people, improving on our already outstanding staff retention by valuing their commitment and emphasising their importance.
- Providing and maintaining safe systems of work, safe healthy conditions and safe equipment, therefore creating a positive health and safety culture for all employees and anyone affected by the Companies undertakings.
- Ensuring that the Company complies with all environmental aspects, therefore helping to maintain the environment for future generations.

Our Strategy:

- Develop, maintain our client base, this can be achieved by establishing new long-term links and partnerships.

### **SUNTER LTD QUALITY MISSION STATEMENT & DIRECTION**

Sunter Limited subscribes to the Quality Policy in place and is committed to implementing and maintaining an quality management system conforming to BS EN ISO 9001 throughout the whole of the company's undertaking and at all of its premises and work sites.

We aim to excel in all areas of our undertakings from the smallest of jobs, through to the largest of Contracts. We have a uniform approach to all work carried out in 'the Sunter name'.

Our Promises include:

- To deliver high quality services and standards of excellence, including enabling services, processes, people and performance.
- To continuously monitor and review, promote and deliver best practice including innovation and longer term efficiency across all company undertakings.
- To deliver contracts in accordance with Clients expectations, ensuring that all requirements are fulfilled.
- To focus on Customers & Client needs, ensuring that all information is given prior to the commencement of works, and establishing positive communication at all times.
- To commit time, resources and financial means to establish a competent, trained and skilful workforce, including the training and development of employees to their maximum potential.
- Ensure employees at all levels are aware of their responsibilities whilst carrying out work on behalf of Sunter Ltd.
- We will ensure that the communication of this policy is achieved to employees, contractors, clients, customers and any other who may wish to view it. Sunter Ltd Directors and Senior Managers ensure that all requirements; both economically and morally are in place and implemented at all times, ensuring that Quality and Quality Management is second nature.....At All Times.

### **Definitions**

There are no definitions within this policy

### **Legislation**

Sunter Limited and its staff will ensure that all requirements of the GDPR Regulations are carried out at all times and that any issue or concern are addressed to the data controller.

### **Reference Documents**

Internal Reference Documents:

- Sunter Limited Integral Management System Manual: Document Reference: IMS Version Annually Updated
- Information Security Policy: PO010 Annually updated

External Documents

- GDPR Regulations 2018

## Monitoring & Review

- This Policy will be continuously monitored and reviewed by the Data Controller.
- This Policy will be given a formal audit annually and any amendments made will be communicated to all relevant parties.
- Additional audits and inspections may be made where required, either internally or from external validators/auditors
- This document will be a formal document, recorded in the company document control register

**Document Date: March 2023**

**Planned review Date: March 2024**

Policy Written by:

Name: John Walker

Signature: 

Position: Health, Safety & Environment Manager

Policy Reviewed by:

Name: Kevin Stubbs

Signature: 

Position: Company Director