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INNOVATIVE SERVICES LTD.

DATA PROTECTION POLICY

DATE OF POLICY	19th August 2022
CREATED BY	J. NAGUAR
Version	1

REVIEW POLICY DATE:	15th February 2024
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POLICY STATEMENT

1. **INNOVATIVE SERVICES LTD.** is fully committed to full compliance with the requirements of the General Data Protection Regulation. **INNOVATIVE SERVICES LTD.** will therefore follow procedures which aim to ensure that all employees, candidates, contractors, consultants, partners, or other agents of **INNOVATIVE SERVICES LTD.** (collectively known as Data Users) who have access to any personal data held by or on behalf of **INNOVATIVE SERVICES LTD.** are fully aware of and abide by their duties under the General Data Protection Regulation.
2. **INNOVATIVE SERVICES LTD.** respects the privacy rights of any person, who's personal data we are entrusted with, and **INNOVATIVE SERVICES LTD.** complies with laws and regulations protecting Personal data. We regard the lawful and appropriate treatment of personal data as very important to our successful operations and essential to maintaining confidence between **INNOVATIVE SERVICES LTD.** and those with whom we carry out business. This Policy covers all personal data collected, processed, shared, or used by **INNOVATIVE SERVICES LTD.**
3. **INNOVATIVE SERVICES LTD.** needs to collect and use information about people with whom it works to operate and carry out its functions. These may include members of the public, current, past, and prospective employees, clients and customers and suppliers, and people who use the services that we provide. This personal data must be handled and dealt with properly however it is collected, recorded, and used and whether it is on paper, in computer records or recorded by other means.
4. It is the responsibility of every **INNOVATIVE SERVICES LTD.** manager to adhere to this Policy within his or her area of functional or business responsibility, to lead by example and to provide guidance to those Data Users reporting to him or her. All Data Users are responsible for adhering to the principles and rules set out in this Policy and are expected to recognise if they are collecting, processing, sharing, or using personal data. Data Users must be aware of the general privacy requirements and principles that govern personal data and know when to escalate issues to the Data Protection Officer.

DATA PROTECTION PRINCIPLES

5. This Policy explains the relevant data privacy principles for the protection of personal data and how such principles are to be implemented.

6. The General Data Protection Regulation (GDPR) provides conditions for the processing of any personal data. It also makes a distinction between Personal data and 'special category' data.

Personal data is defined as any information relating to an identified or identifiable natural person.

Special category data is defined as Personal data consisting of information as to:

- Racial or ethnic origin
- Political opinion
- Religious/philosophical beliefs
- Trade union membership
- Physical or mental health or condition
- Sexual life or sexual orientation
- Biometric data

7. Any Data User processing personal data must comply with 6 principles of good practice.

The principles require that personal data shall be:

- i. Processed lawfully, fairly and in a transparent manner in relation to individuals.
- ii. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- iii. Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed accurately.
- iv. Is accurate.
- v. 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.
- vi. 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, and acting in accordance with the rights of data subjects under the GDPR.

8. A fundamental principle of Data Privacy requires that **INNOVATIVE SERVICES LTD.** processes personal data fairly and lawfully. When collecting and using personal data consider how you would like to be treated by a company who is collecting your personal data and apply relevant laws, regulations, and this Policy.

9. All **INNOVATIVE SERVICES LTD.** data users must :

- Collect and use personal data only with a legal justification which may include the legitimate business interests of **INNOVATIVE SERVICES LTD.** For example, some **INNOVATIVE SERVICES LTD.** guidelines or local laws may require explicit consent of the person concerned prior to collecting Personal data.
- Notify people about how their personal data will be used prior to collecting the information ("Privacy Notice"). Note – this doesn't mean you need to inform individuals personally, but you can refer people to a specific Privacy Notice that is relevant and applicable.
- Collect only the personal data required for a specific business purpose.
- Be aware of any contractual obligations regarding the processing of personal data (including any specific methods of transfer or security requirements).
- Use personal data only for the specific business purpose described in the Privacy Notice or Consent Form or in a way that the person would reasonably expect. "Consent" means any freely given, unambiguous, revocable, and informed indication of the person's agreement to the processing of his/her Personal data. A Privacy Notice means an oral or written statement that individuals are given when Personal data about them is being collected. The Privacy Notice describes who is collecting personal data, why personal data is being collected, how it will be used shares, stored and any other relevant information of which the person should be aware.
- Use personal data in ways that do not have an adverse effect on the person concerned unless such use is justified by law.
- Anonymise personal data where possible and appropriate in a way that ensures the necessary safeguarding of personal data and Special Category personal data.

10. Responsible management of personal data is required to protect privacy rights and comply with Data Privacy laws.

11. Where we collect, use and/or maintain personal data **INNOVATIVE SERVICES LTD.** must take the appropriate steps to :

- Keep personal data accurate and up to date throughout the Information Lifecycle (from collection to destruction) and for only as long as necessary for the purpose or as required by law.
- Safeguard personal data so that is not shared with others who do not have a valid business reason to access the information.
- Comply with **INNOVATIVE SERVICES LTD.** Information Security Policies and procedures when processing Personal data
- Prevent the misuse of personal data for a purpose that is not compatible with the original purpose for which it was collected.
- Ensure Traceability of personal data throughout its lifecycle. "Traceability" follows the lifecycle of Information to track all access and changes to personal data and locations of the personal data. It helps **INNOVATIVE SERVICES LTD.** demonstrate transparency, compliance, and adherence to regulations.
- Report any Data Privacy breach in accordance with the terms of the Data Breach Policy. Data Privacy Breach means any unauthorised disclosure, acquisition, access, destruction, or alteration of, or any similar action involving personal data, or any other incident where the confidentiality, integrity or availability of personal data may have been compromised.

LAWFUL PROCESSING OF DATA

12. Under the GDPR (and under the current Data Protection rules), there needs to be a lawful basis for processing personal data. Data may not be processed unless there is at least one lawful basis to do so:

13. The key "lawful basis" grounds for processing data that will apply to **INNOVATIVE SERVICES**

LTD. are that:

- Processing is necessary for the performance of a contract to which the data subject is party (such as an employment contract) or to take steps at the request of the data subject prior to entering a contract - this will often be the case where this is HR data.
- Processing is necessary for us to comply with our legal obligations.
- Processing is necessary for the purposes of **INNOVATIVE SERVICES LTD.** legitimate business interests.
- Consent has been given to us where we are Data Controller - by the person whose personal data is processed. Where we are relying on consent as the lawful basis for processing, that consent must be explicit in respect of the data collected and the purposes data is used for, and a record kept of such consent.

DATA TRANSFERS

14. Personal data may necessarily be shared with other **INNOVATIVE SERVICES LTD.** affiliates, government agencies and third parties for legitimate business reasons or as otherwise allowed or required by law. Data Users who share personal data with third parties must obtain assurance that the third party has the ability and intention to protect personal data, consistent with the standards and principles contained in this Policy. This may be done through third party due diligence, risk assessment and/or a contract. If risks are identified, then appropriate requirements (including technical safeguards and organisational measures) must be set out to ensure adequate protection of personal data. A processing agreement will usually be required whenever a third is provided access to Personal data to process such personal data on behalf of **INNOVATIVE SERVICES LTD.** If such agreement is not in place this should be reviewed with the Data Protection Officer for the business. In addition, similar arrangements are required where **INNOVATIVE SERVICES LTD.** businesses process data to or on behalf of each other.

15. Questions regarding requirements for the disclosure of personal data to third parties should be addressed to the Data Protection Officer.

16. In many instances, the use of third parties will also involve the transfer of personal data across country borders. Also, many business processes require the transfer of data within

INNOVATIVE SERVICES LTD.

17. When you transfer personal data across borders to third parties we need to:

- Determine that we have a legitimate justification for the transfer of personal data (e.g., valid business reason).
- Follow the instructions or any local legal requirements (e.g. notice to the individual, notification to Data Protection Authority).

INDIVIDUAL RIGHTS REGARDING PERSONAL DATA

18. We have in place arrangements for Data Subjects to exercise their individual rights regarding personal data. These include Data Subject Access Requests, and other rights about the Personal data. In the event of a request made by a Data Subject then this should be actioned in accordance with the Data Subject Access process. In respect of other requests made – such as the right to portability or any requests to be forgotten – these should be referred to the relevant Data Protection Officer.

19. In the event of Data Breaches, you must follow the Data Breach Management Policy without delay.

RAISING CONCERNS

20. In respect of any concerns regarding the appropriate management of personal data, any Associate, who learns of a potential violation of applicable laws and/or this Policy should notify the relevant Data Protection Officer immediately.