

Policy On Information Security And Data Protection

As a recruitment company, Petrolic Consultants Ltd processes personal data in relation to its own staff, work-seekers and individual client contacts. It is vitally important that we abide by the principles of the Data Protection Act 1998 set out below.

Petrolic Consultants Ltd holds data on individuals for the following general purposes:

- Staff Administration
- Advertising, marketing and public relations
- Accounts and records
- Administration and processing of work-seekers personal data for the purposes of work-finding services

The Data Protection Act 1998 requires Petrolic Consultants Ltd as data controller to process data in accordance with the principles of data protection. These require that data shall be:-

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with the data subjects rights
- Kept securely
- Not transferred to countries outside the European Economic Area without adequate protection.

Personal data means data, which relates to a living individual who can be identified from the data or from the data together with other information, which is in the possession of, or is likely to come into possession of, Petrolic Consultants Ltd.

Processing means obtaining, recording or holding the data or carrying out any operation or set of operations on the data. It includes organising, adapting and amending the data, retrieval, consultation and use of the data, disclosing and erasure or destruction of the data. It is difficult to envisage any activity involving data, which does not amount to processing. It applies to any processing that is carried out on computer including any type of computer however described, main frame, desktop, laptop, palm top etc.

Petrolic Consultants Ltd will review data on a regular basis to ensure that it is accurate, relevant and up to date.

Data may only be processed with the consent of the person whose data is held. Therefore if they have not consented to their personal details being passed to a third party this may constitute a breach of the Data Protection Act 1998. By instructing Petrolic Consultants Ltd to look for work and providing us with personal data contained in a CV work-seekers will be giving their consent to processing their details for work-finding purposes. Petrolic Consultants Ltd will always obtain specific consent from work-seekers if the data is to be used for any other purpose.

Petrolic Consultants Ltd will exercise caution before forwarding personal details of any of the individuals on which data is held to any third party such as past, current or prospective employers; suppliers; customers and clients; persons making an enquiry or complaint and any other third party.

Data in respect of the following is "sensitive personal data" and any information held on any of these matters MUST not be passed on to any third party without the express written consent of the individual:

- Any offence committed or alleged to be committed by them
- Proceedings in relation to any offence and any sentence passed
- Physical or mental health or condition

- Racial or ethnic origins
- Sexual life
- Political opinions
- Religious beliefs or beliefs of a similar nature
- Whether someone is a member of a trade union

Petrolic Consultants Ltd will ensure that adequate security measures are in place for data protection purposes and that all members of staff are aware of their obligations. Any failure to observe the contents of this policy or a breach due to negligence by a member of staff will be treated as a disciplinary offence.

Data subjects, i.e. those on whom personal data is held, are entitled to obtain access to their data on request and after payment of a fee. All requests to access data by data subjects i.e. staff, members, customers or clients, suppliers, students etc should be referred to The General Manager and marked Private & Confidential.

Petrolic Consultants Ltd recognises that all individuals have the following rights under the Human Rights Act 1998 and in dealing with personal data these should be respected at all times:

- Right to respect for private and family life [Article 8]
- Freedom of thought, conscience and religion [Article 9]
- Freedom of expression [Article 10]
- Freedom of assembly and association [Article 11]
- Freedom from discrimination [Article 14]