



GDPR POLICY 2024

PURPOSE

WHAT YOU SHOULD KNOW

The new regulation gives individuals more control and rights over the processing of their personal data. In addition, it introduces more accountability on data controllers like CSH Environmental Group to demonstrate compliance with data protection law.

Some of the highlights in GDPR are as follows:

All personal data must be processed lawfully, fairly and transparently. It must be collected for a specific and lawful purpose, limited to what is necessary to fulfil the purpose, kept accurate and for no longer in time than is necessary as well as processed in a secure way. CSH Environmental Group must be able to demonstrate compliance with these principles.

Data subjects (e.g. staff members and client) must be provided with detailed information including an explanation as to the purpose and legal basis for processing.

Data subjects have increased rights in relation to the processing of their personal data. Some operate in only certain circumstances.

Greater safeguards exist when processing 'special category' personal data. This includes data relating to health, religion, race, sexual orientation, genetics and biometrics.

CSH Environmental Group must ensure data protection 'by design' and 'by default', which means it must ensure there are appropriate technical and organisational controls in place to process personal data securely.

It must also ensure that major projects and developments are subject, where appropriate, to Data Protection Impact Assessments (DPIAs).

Safeguards must be in place if personal data is to be transferred outside of the EEA.

CSH Environmental Group must notify the regulator, the ICO, of any data protection breach 72 hours, at the latest, after becoming aware of it unless it does not pose a risk to the rights and freedoms of the individuals concerned.

Employees duty to inform us of changes.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. Under certain circumstances, by law you have the right to:

- access and obtain a copy of your data on request.
- Require CSH Environmental Group to change incorrect or incomplete data.
- Require CSH Environmental Group to delete or stop processing your data, for example where the
 data is no longer necessary for the purposes of processing; and
- object to the processing of your data where CSH Environmental Group is relying on its legitimate interests as the legal ground for processing.

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PRIVACY POLICY

Data controller: CSH Environmental Group

This notice applies to current and former employees, workers and contractors.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes. Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about. Kept securely.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). CSH Environmental Group collects and processes personal data relating to its employees to manage employment relationships. The company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

There are "special categories" of more sensitive personal data which require a higher level of protection.





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What information does CSH Environmental Group collect?

The company collects and processes a range of information about you. This includes: Your name, address and contact details, including email address and telephone number, date of birth and gender.

- the terms and conditions of your employment.
- details of your qualifications, skills, experience and employment history, including start and end
 dates, with previous employers and with CSH. information about your remuneration, including
 entitlement to benefits such as pensions or insurance cover.
- details of your bank account and national insurance number.
- information about your marital status, next of kin, dependents and emergency contacts.
- information about your nationality and entitlement to work in the UK.
- details of your schedule (days of work and working hours) and attendance at work.
- details of periods of leave taken by you, including holiday, sickness absence, family leave and the reasons for the leave.
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.
- assessments of your performance, including appraisals, performance reviews, performance improvement plans and related correspondence.

We may also collect, store and use the following "special categories" of more sensitive personal information including:

- information about medical or health conditions, including whether or not you have a disability for which the company needs to make reasonable adjustments; and equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.
- Biometric data, including fingerprints, hand geometry and samples.

How is your personal information collected?

The company may collect this information in a variety of ways. For example, data might be collected through application forms, CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

In some cases, CSH Environmental Group may collect personal data about you from third parties, such as references supplied by former employers and information from employment background check providers.

Data will be stored in a range of different places, including in your personnel file, in the company's HR management system, and in other IT systems (including email system).

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Why does CSH Environmental Group process personal data?

The company needs to process data to enter an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer entitlements [benefit, pension and insurance].

In some cases, CSH Environmental Group needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled: -

- where we need to protect your interests (or someone else's interests). where it is needed in the public interest (or for official purposes).
- In other cases, CSH Environmental Group has a legitimate interest in processing personal data before, during and after the end of the employment relationship.
 Processing employee data allows CSH Environmental Group to:
- run recruitment and promotion processes.
- maintain accurate and up-to-date employment records and contact details (including
- details of who to contact in the event of an emergency), and records of employee contractual and statutory rights.
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace.
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes.
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled.
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals
 with disabilities, meet its obligations under health and safety law, and ensure that employees are
 receiving the pay or other benefits to which they are entitled.
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that CSH Environmental Group complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration. provide references on request for current or former employees. respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

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Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities).

Where CSH Environmental Group processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that CSH Environmental Group uses for these purposes is anonymized. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

Signed:

Mark Slade Director

Dated: 19.02.2024