



# IMS P 011 Data Protection Policy

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## 1. Purpose

The purpose of this policy is to ensure compliance with the General Data Protection Regulation and related EU and national legislation ('data protection law'). Data protection law applies to the storing or handling ('processing') of information ('personal data') about living identifiable individuals ('data subjects').

## 2. Scope

This policy applies to all parts of MJ Church (Plant) Ltd., as a single organisation ('data controller'), and all subsidiary companies where their own policy does not exist.

This policy applies to all staff. In this policy, the term 'staff' means anyone working in any context within the company at whatever level or grade and whether permanent, fixed term or temporary or part-time. This policy should not be confused with the Privacy Policy IMS P 012.

## 3. Policy requirements

### 3.1. General requirements

Complying with Data protection law is summarised below, but is not limited to:

- understanding and applying as necessary, the data protection principles when processing personal data;
- understanding and fulfilling as necessary, the rights given to data subjects under data protection law; and
- understanding, and implementing as necessary, MJ Church's accountability obligations under data protection law.

The Responsible Person shall take responsibility for MJ Church's ongoing compliance with this policy.

Individual staff, as appropriate for their role and in order to enable the company to comply with data protection law, are responsible for:

- completing relevant data protection training;
- when processing personal data on behalf of the company, only using it as necessary for their contractual duties and/or other MJ Church roles and not disclosing it unnecessarily or inappropriately;
- recognising, reporting internally, and cooperating with any remedial work arising from personal data breaches;
- recognising, reporting internally, and cooperating with the fulfilment of data subject rights requests;



- only deleting, copying or removing personal data when leaving the company as agreed with their Department Head and as appropriate.

This policy shall be reviewed at least annually.

MJ Church shall register with the Information Commissioner's Office as an organisation that processes personal data.

### 3.2. Data protection principles

MJ Church is committed to processing data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- 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 not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 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 without delay;
- 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 the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- 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.”

### 3.3. Lawful, fair and transparent processing

- MJ Church shall maintain a Register of Systems and ensure its processing of data is lawful, fair and transparent,
- The Register of Systems shall be reviewed at least annually,
- Individuals have the right to access their personal data and any such requests made to MJ Church shall be dealt with in a timely manner.



### 3.4. Lawful purpose

- All data processed by MJ Church must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- MJ Church shall note the appropriate lawful basis in the Register of Systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in MJ Church's systems.

### 3.5. Data minimisation

- MJ Church shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- MJ Church carries out an annual review of its systems, information and assets to ensure that it minimises and reduces where possible.

### 3.6. Accuracy

- MJ Church shall take reasonable steps to ensure personal data is accurate.
- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- MJ Church has ensures that through it's privacy policy and various fair processing notices throughout it's data capturing channels that data subjects have a clear route to exercising their rights, including updating of information.

### 3.7. Security

Please refer to the information security policy for more information <https://sharepoint.link/sharepoint>

### 3.8. Breaches

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, MJ Church shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

MJ Church operates a robust incident management process to identify, contain and manage the risk and protection of individuals' rights and freedoms. If it is deemed that the rights and freedoms of an individual is at risk, MJ Church will contact the relevant individuals in parallel with the ICO.



## 3.9. Archiving / removal

MJ Church will remove personal data from it's systems when the data is no longer required for the purposes for which it was collected; and when a request for removal have been received from the data subject.

## 4. Glossary of terms

DPA 2018	The Data Protection Act 2018
Responsible person	Means the Data Protection Officer **
Register of systems	The MJ Church data asset and system register

## 5. Related documents

Name	Location	Date
Information security policy	SharePoint	18/10/2020

## 6. Review

This document will be reviewed annually as was last reviewed 18/10/2020

## 7. Non-compliance

Non-compliance to this policy can lead to disciplinary action and personal accountability under the relevant law.

**Ben Staff**  
**Group Managing Director**  
**MJ Church (Plant) Ltd**  
**November 2020**