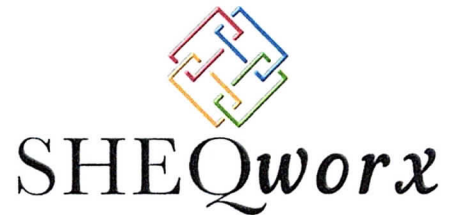


# Privacy & Data Protection Policy Statement



## Section 1. Introduction

As a professional consultancy business, we fully support the principles identified in the General Data Protection Regulation (GDPR) 2016/679 and the Data Protection Act 2018, acknowledging Data Protection as a fundamental business consideration.

We are committed to safeguarding the personal data and privacy of our website visitors, clients (including their staff and contractors), students and others who have chosen to interact with us in the course of our business activities.

Please take the time to read this document carefully and don't hesitate to contact us at [hello@sheqworx.co.uk](mailto:hello@sheqworx.co.uk) with any general questions or queries. A copy of our full Privacy & Data Protection Policy and any other documentation referred to herein, can be accessed via the website or by emailing us at [hello@sheqworx.co.uk](mailto:hello@sheqworx.co.uk)

**Note:** If you do not agree to your personal data being used in accordance with this Privacy Statement, please do not submit your personal data to us through the website or any other means. Please also refer to our Cookie Policy. You can set your browser to refuse all or some browser cookies. However, if you choose to disable or refuse cookies, some parts of our website may become inaccessible or not function properly and could affect your experience.

### Aged 16 or Under?

**If you are 16 years or under** contact the [data.controller@sheqworx.co.uk](mailto:data.controller@sheqworx.co.uk) **before** continuing to use our website, **and before** signing up to receive any of our products or services, either free or paid.

This is to help us comply with the law.

Thank You for understanding 😊

This Privacy Statement and supporting Policies form part of our General Terms and Conditions of Business.

We've identified some of the frequently used terms and definitions in the table below.

**Note:** the examples provided throughout this document, do not include every type of information which could be directly or indirectly used to identify an individual. They are provided as examples only.

# Privacy & Data Protection Policy Statement



|  |  |
|--|--|
| "personal data"  | Name, date of birth, email address, residential address, phone number, IP address, Browser Cookies, geo-tracking data, Bank Account details etc  |
| "sensitive personal data" or "special categories" of personal data | Ethnic or racial origin, political opinion, religious beliefs, philosophical beliefs, trade union membership, genetic and bio-metric data  |
| "data controller"  | This is SHEQworx when performing tasks directly relating to our own business operations  |
| "data processor"   | This is SHEQworx when it is performing a specific service to a client (who are the data controller) which requires data collection, analysis and/or other processing to satisfy a contractual obligation |
| "personal data breach"   | Includes the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed                                   |

SHEQworx Ltd has been identified as both a "data controller" and a "data processor" under GDPR.

## Section 2 Our Promise to You

SHEQworx shall do its best to ensure that personal data under our control is:

- processed **lawfully, fairly** and in a **transparent** manner;
- collected for **specific, explicit** and **legitimate** purposes;
- **adequate, relevant** and **limited** to what's absolutely necessary for us to fulfil our contractual obligations;
- **accurate**, and where necessary, **kept up to date**;
- processed in accordance with the fundamental **rights of individuals**;
- protected during collection, use and storage to ensure the **security** of the personal data.

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

We will not release your information to third parties for them to use for their own purposes unless you have requested that we do so, or we are required by law, for example by a court order or for the purposes of crime prevention including fraud.



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## Section 3 The 6 Lawful Bases for Processing Your Data

There are 6 conditions under which we can process your data lawfully, and at least one of the following must apply:

Legal Basis Number 1: **You have given your consent** for us to process your data for one or more clearly identified reasons at the point you complete your data,

### Lawful:



### Not lawful:



### Lawful



**NOTE:** You will be able to unsubscribe to any of our emails at any time, **BUT** this may affect your ability to access some of the supporting materials required for a training course for example. Where this applies, we'll let you know at the time.

Legal Basis Number 2: The processing is necessary for the **performance of a contract** between us, or in the preparation of entering into a contract.

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You're interested in our products or services, let's say a training course. You reach out to us for more information about the course contents, and we reply with a Booking Form and our Terms and Conditions. You then complete the Booking Form and send it back to us, agreeing to our terms and conditions by this act. We send you an invoice. You make the payment. We then send you a receipt and a set of joining instructions for your course, and other supporting information such as a workbook that accompanies the course.

Legal Basis Number 3: The processing is necessary for **compliance with a legal obligation** as set out in UK or EU law, and we must fulfil. One example given by the ICO in their Guidance document is "A court may require [us] to process personal data for a particular purpose". This is a basis we could use especially if we are required to collect or analyse occupational health, safety and wellbeing data as part of our independent, confidential, consultancy services.

Legal Basis Number 4: The processing is necessary to **protect your vital interests** for example, life and death. It's unlikely we'll need to use this as a basis for processing your data. It's more likely necessary in an emergency situation. That said, when offering First Aid support we may need to determine if you suffer from

allergies or have any other medical conditions which require communication to the emergency services.

Legal Basis Number 5: Processing is necessary for the **performance of a task carried out in the public interest of in the exercise of official authority vested in the controller**. It's unlikely we'll be using this as a basis for processing your data as it doesn't really fit with what we do.

Legal Basis Number 6: Processing is necessary for the purposes of **legitimate interests**. This is a tad vague to be honest, and a three-stage test will apply to anyone using this as a reason for processing your data:

1. That a legitimate interest has been identified;
2. Demonstrate that the processing of data is necessary to achieve it; and
3. The processing is balanced against your interests, rights and freedoms.

It is possible we *could* use this as a legal reason, but this will be determined on a case-by-case basis.



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So, in summary, we're most likely to collect and process your data for one or more of these reasons:

- ✓ after you have consented to us processing your data for a clearly defined purpose (or purposes),
- ✓ in the performance of a contract with you
- ✓ to comply with a legal obligation placed on us,
- ✓ *and possibly* to protect your vital interests in a face-to-face setting,
- ✓ *and possibly* for the purposes of legitimate interests

## Section 4 SHEQworx as “Data Controller” – an overview of the suppliers we use and their purpose

Note: All items identified below are individually password protected, with access restricted to the Data Controller only.

In no particular order:

We use an [Email Service Provider \(ESP\)](#) to communicate with our clients, followers and for general marketing and dissemination of information purposes on a large scale. (For more personal emails we tend to use Microsoft Outlook.)

We use a scheduling software to schedule a 1:1 Consultation Appointment or book places on training courses.

We use a couple of [payment processing applications](#) for instant web-based purchases or purchases not requiring an invoice.

We use software for promotional, and advertising purposes.

We use software to host our online training courses.

We use [accounting software](#) for the day-to-day financial management of our business, and for Payroll and VAT purposes.

We use [project management software](#) to keep track of live projects we're working on with our clients.

We use a [password vault](#), which has restricted access, and is only accessible via passwords which are also encrypted.

We use an [admin software](#) such as Word, Excel, Powerpoint, Outlook, etc

We use software for producing and collating responses to [questionnaires](#), [contact forms](#), etc

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## Section 5 SHEQworx as “Data Processor” – an overview of the services we provide and work we do

We provide a range of support services to other businesses under the umbrella of risk management and legal compliance, focusing on the aspects of occupational safety, health, environment, and quality (SHEQ). We’ve listed a few in the bullet points below.

Our business activities are predominantly consultancy and training services, from the development and auditing of management systems, creation of policy and other supporting documentation, through to offering contract support on construction sites.

Rail is our specialist subject. We use our knowledge and experience to support our customers. Our work can take us onto client construction sites, into their offices, and external training venues such as conference suites in hotels, and/or in our own offices.

We use a combination of desktop computers, laptops, mobile phones and tablets, all of which are password protected as a minimum. Each software application we use to deliver our clients work (and manage our employees’ personal details) are password protected with access restricted to a “need to know” basis. We employ less than 5 people, and our business is operated from one location – Farrier House in Wetherby.

- Audits – Management Systems to ISO 9001:2015, 45001:2018 standards
- Audits – Site – SHEQ tours, inspections, and audits
- Management Systems – process and document review, accreditation, policy and supporting documents created, etc
- SHEQ Training Courses & Workshops - Online, classroom and event-based eg Risk Assessment Workshops, Adult Mental Health First Aid (MHFA England licenced)
- Safety Climate Survey
- Health & Wellbeing Survey
- SHEQ Support Services - contract services delivered on client premises and construction sites.



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## Section 6 Data Safeguarding and Security

The safety and security of your personal data in all of its various forms is important to us. We have never, and will never, knowingly sell or rent your data to anyone. Ever.

We protect it like it's our own.

We use a mixture of technical and procedural measures to ensure your data is as protected as it can be.

Access to the various software, applications and tools is restricted and strictly controlled within the organisation.

## Section 7 Your Rights – A Summary

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”.) This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note: we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

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Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- a) if you want us to establish the data's accuracy;
- b) where our use of the data is unlawful but you do not want us to erase it;
- c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds for it.

Request the transfer of your personal data to you or a third party. We will provide to you, or a third party you have selected, your personal data in a structured, commonly used, machine-readable format (most likely using Word or Excel software). This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

## Section 8 Who is the “Data Controller” in SHEQworx and how do I Contact them?

The data controller is Andrea Dodds

Andrea can be contacted via email, telephone, or good, old-fashioned snail mail:

|   |   |
|---|---|
|  | The best way to reach me is via email<br><a href="mailto:datacontroller@sheqworx.com">datacontroller@sheqworx.com</a> |
|  | +44 (0) 1937 538380   |
|  | SHEQworx Ltd<br>Farrier House – 1 <sup>st</sup> Floor<br>15 Victoria Street<br>Wetherby<br>West Yorkshire, LS22 6RE   |



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## Section 9 How to make a Complaint

We try our best, we're only human, and unfortunately, mistakes can (and do) happen from time to time.

If you feel that we haven't looked after your personal data properly, please let us know and we'll do our best to rectify the situation.

However, at any time, you have the right to lodge a complaint with the UK's supervisory authority:

The Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk))

Our registration number is: ZA749032

## Section 10 Disclaimer

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee 100% the security of your personal information transmitted to our website. Any transmission of personal data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website, including the illegal acts of third parties (such as criminal hacking).

The terms of this Policy Statement and supporting documentation may change from time to time. If we make material changes to how we treat your personal data we will notify you by email to the email address specified on your account. Your continued use of our services and website constitutes your consent to such revised Privacy Policy.

If you have any questions concerning the contents of this or any supporting Policy documents, please contact us at [datacontroller@SHEQworx.com](mailto:datacontroller@SHEQworx.com).

AUTHORISATION

A handwritten signature in blue ink that reads "Andrea Dodds".

**Andrea Dodds**  
**Managing Director**  
**15<sup>th</sup> December 2020**

# Privacy & Data Protection Policy Statement



Date of Next Planned Document Review: 14<sup>th</sup> Dec 2021

## Revision Log

| Version | Reason(s) for Revision and Up-Issue | Date of Change | Authorised By |
|---------|-------------------------------------|----------------|---------------|
| Draft   | Document created                    | Aug 2020       | A Dodds       |
| 01      | Document Issued                     | 15/12/2020     | A Dodds       |
|         |                                     |                |               |
|         |                                     |                |               |