



GDPR | DATA PROTECTION POLICY

INTRODUCTION

CID Trading Ltd needs to collect and use certain types of information about the Individuals or Service Users who come into contact with Specialist Tiling Supplies Limited in order to carry on our work. This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the General Data Protection Regulation (GDPR).

DATA CONTROLLER

CID Trading Ltd is the Data Controller under the GDPR, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner's Office of any data breach which may occur.

DISCLOSURE

CID Trading Ltd may share data with other agencies such as the local authority, funding bodies and other voluntary agencies.

The Individual/Service User will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows CID Trading Ltd to disclose data (including sensitive data) without the data subject's consent.

These are:

- Carrying out a legal duty or as authorised by the Secretary of State
- Protecting vital interests of an Individual/Service User or other person
- The Individual/Service User has already made the information public
- Conducting any legal proceedings, obtaining legal advice or defending any legal rights

CID Trading Ltd regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal and intends to ensure that personal information is treated lawfully and correctly. To this end, Specialist Tiling Supplies Limited will adhere to the Principles of Data Protection, as detailed in the GDPR.

Specifically, the Data Protection Principles require that personal information:

- Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- Shall be obtained only for one or more of the purposes specified in the GDPR, and shall not be processed in any manner incompatible with that purpose or those purposes,
- Shall be adequate, relevant and not excessive in relation to those purpose(s)
- Shall be accurate and, where necessary, kept up to date,
- Shall not be kept for longer than is necessary
- Shall be processed in accordance with the rights of data subjects under GDPR,
- Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information.

CID Trading Ltd will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the GDPR.

These include:

- the right to be informed
- the right of access
- the right to have inaccuracies corrected
- the right to have information erased (in certain cases)
- the right to restrict processing
- the right to data portability
- the right to object
- the right to prevent automated decision-making including profiling

CID Trading Ltd will take appropriate technical and organisational security measures to safeguard personal information to

- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

DATA COLLECTION

Where consent is required under the GDPR, CID Trading Ltd abides by the high standard the GDPR sets which means offering individuals genuine choice and control. This applies to data that is collected in person, or by completing a form.

The following shall apply:

- Consent requires a specific positive opt-in, CID Trading Ltd will not make use of pre-ticked boxes or any other method of consent by default
- Consent requests shall be clear and concise
- Consent requests are kept separate from other terms and conditions.
- Instructions are given to persons giving consent as to how to easily withdraw the consent.
- Any third parties who will rely on the consent will be named.
- Evidence will be kept of consent

When collecting data, CID Trading Ltd will ensure that the Individual/Service User:

- Clearly understands why the information is needed
- Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
- As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- Has received sufficient information on why their data is needed and how it will be used



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DATA STORAGE

Information and records relating to service users will be stored securely and will only be accessible to authorised staff.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately.

It is CID Trading Ltd responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

DATA ACCESS AND ACCURACY

All Individuals/Service Users have the right to access the information CID Trading Ltd holds about them. CID Trading Ltd will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition CID Trading Ltd will ensure that:

- It has a GDPR Responsible Person with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will regularly review and audit the ways it hold, manage and use personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the GDPR

In case of any queries or questions in relation to this policy, please contact the CID Trading Ltd GDPR Responsible Person: this function is carried out by the Managing Director



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THE SIGNATURE BELOW DEMONSTRATES THAT THIS DOCUMENT HAS BEEN AUTHORISED:

Company Name	CID Trading Ltd
Document Name	Data Protection Policy
Signed	
Print:	Ted Soulsby
Position	Managing Director
Date:	19 th April 2024
Review Date:	19 th April 2025