



## **GDPR Privacy Policy – May18**

This privacy policy demonstrates that Crest Employment Services Ltd as the Data Controller, understands and complies with the provisions of the GDPR regarding the lawful conditions for processing personal data.

### The Policy states;

What data we collect

Why we collect it

How we use it

Who we share it with

How long we retain it

How a data subject can manage the data we have

## **Compliance with GDPR principles**

### Lawfulness, fairness & transparency

Crest Employment has in place contracts with end hirers, payroll companies and workers which describe what personal data is collected, processed and used in the performance of a contract.

Contracts are updated with them to include a number of mandatory clauses that can be found in Article 28(3) of the GDPR. These provisions ensure that processors are contractually obliged to provide GDPR compliant data protection standards.

Where necessary we share information with financial institutions to process payments.

We do not use profiling, we do not sell or pass your data to third parties.

We do not use your data for purposes other than those specified.

We do not transfer personal data overseas.

Workers are automatically provided with access to the personal data being held including (but not limited to) personal identification (e.g. name, address, date of birth, mobile telephone number & email), bank information (for payments), tax and NI information and payment history.

### Purpose limitation

Following consent given by the data subject to record personal data received, data held on the Crest Employment database is there for the purposes of fulfilment of a contractual obligation or legal obligation.

### Data minimisation

Where documents are uploaded (e.g. CVs and identify documents, Passport, Driving Licences, ECS/IPAF/PASMA Cards) these are done so to facilitate the specific performance of a contractual obligation or to fulfil a legal obligation.

### Accuracy

Personal data can be corrected, updated or deleted, by workers contacting the Data Processor within Crest Employment, the data change is monitored and managed to completion.

### Storage limitation

We will retain data following a placement or payment for a worker for a period of seven years, at the end of this period it will be deleted from our systems.

If we have not processed a placement or payment for the worker, but they have provided us with personal data and accepted our data processing terms, we will retain their personal data for a period of two years, at the end of this period it will be deleted from our systems.

A worker can request that their data is retained rather than deleted at the end of either period.

### Accountability

Crest Employment is fully capable of tracking data processed through its software systems and provide compliance confirmation to contractual or regulatory bodies.

### Integrity & confidentiality

Crest Employment has adopted organisational measures to prevent accidental or unlawful destruction, loss, alteration, unauthorised disclosure or transmission of Personal Data.

Access to software systems is only provided to authorized users.

Any data breach (such as sending an email to the wrong person), will be reported to the data subject within 72 hours, the report will contain the nature of the breach and will propose how it will or has been rectified.

