



CECA (NE) Ltd: GDPR Policy

Introduction

The Civil Engineering Contractors Association (North East) Ltd, known as CECA NE is a subscription based membership organisation, representing the bulk of those companies who build and maintain the UK's public infrastructure.

CECA NE is committed to protecting the rights and freedoms of data subjects and to safely and securely processing their data in accordance with all of our legal obligations.

We hold personal data about our employees, subscribed members, suppliers and stakeholders for a variety of business purposes.

This policy sets out how we seek to protect personal data and ensure that our staff understand the rules governing their use of the personal data to which they have access in the course of their work.

This policy will be reviewed on a regular basis and CECA NE staff will be notified of any change.

CECA NE's Management Board will be kept abreast of CECA NE's GDPR compliance.

Definitions

Business purposes

The purposes for which personal data may be used by CECA NE includes: personnel, administrative, financial, regulatory, payroll and for business development.

CECA NE's business purposes include:

- Compliance with our legal and regulatory requirements.
- Ensuring we represent the interests of subscribed members.
- Operational reasons, such as recording transactions.
- Employee management.

Personal data

Personal data means any information that can identify an individual.

CECA NE's collection of personal data may include:

Name, phone number, email address, educational background, financial and pay details, skills, marital status, job title and CV.

Our website (developed and hosted by external providers) collects personal data via: Cookies and Google Analytics.

Special categories of personal data

This is the collection of extremely sensitive information, such as race, ethnic origin, political opinions, beliefs, trade union membership, health and criminal offences or related proceedings.

This level of information is not routinely collected by CECA NE.

Controlling and processing data

Processing data means how it is used and managed.

Data Controllers: Determine the purposes for which and the manner in which any personal data is or will be processed.

Data Processors: In relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

CECA NE operates as both data controller and data processor.

CECA NE does not automate any of its data processing or management.

Supervisory authority

The national body responsible for data protection is the Information Commissioner's Office <https://ico.org.uk/>. Individuals have the right to complain to the Information Commissioners if they think there is a problem with the way their data has been handled.

Scope

This policy applies to all CECA NE staff, who have been trained on GDPR compliance, and who must continue to familiarise themselves with the new rules and comply. It is subject to change and will be updated when appropriate.

The principles

CECA NE will make every effort to fully comply with the principles of GDPR.

These are:

1. Data collection must be fair, lawful and transparent.
2. Data is only collected for a specific purpose.
3. We will only collect necessary data.
4. The data we hold is accurate and is kept up to date.
5. We will not store data for longer than necessary.
6. The data we hold is safe and secure

Our data

CECA NE securely holds current personal data from:

- Individual members and customers who we actively engage with.
- Invoices & sales.
- Current employees.

We share data on an extremely limited and relevant basis with the following:

For employee data

- Accountants.
- Pension provider.
- Bank.

For member data

- The CITB to fulfil our funding agreement.

Other

- Bank, for general business transactions.
- Other Regional Offices and CECA (National), to ensure the needs of subscribed member companies are met.

IT provider and web developer

- As part of the existing contracts and service agreements we hold with them.

How we manage it

- CECA NE staff collect the minimal amount of personal data required to fulfil business requirements as a membership organisation. It is held securely and is not retained for longer than necessary.
- All CECA NE staff are aware and have been trained on the new rules and will comply accordingly. Steps taken on a daily basis will include: A clean desk policy, locking data away securely, regular shredding, password protected computers, email accounts and phones and responsible use of data when working remotely.
- All CECA NE staff, members and stakeholders, are encouraged to raise concerns over compliance with the Director & Secretary.
- CECA NE will write to those who process our data to reflect GDPR requirements.
- CECA NE will specifically communicate the changes in law to members via: our News Digest, our new website (which will be GDPR compliant), existing lists and future surveys. Consent must be freely given.
- CECA NE will develop a privacy policy for its new website, surveys and email footers.

- CECA NE will only communicate with its stakeholders when there is a solid business reason for doing so.
- CECA NE will delete guest lists from its public facing events no more than 6 weeks after the event has been held.
- CECA NE will erase data it holds (and notify other organisations if relevant) upon one month of any request, unless there is a reason for not doing so.
- CECA NE will immediately comply with any request to restrict / block or otherwise suppress the processing of personal data.
- CECA NE will meet its requirements in terms of a subject access request / and or data portability request by searching its categorised electronic and limited paper data files, providing information in a clear format and by making requested changes within one month.
- CECA NE is at low risk of a data breach. Any such breach would most likely come from an IT or website failure, or loss of a password protected electronic device or a memory stick. Upon notification of a breach, CECA NE will work with staff and suppliers to mitigate the loss of any personal data.
- CECA NE will use password protected / encrypted memory sticks.
- CECA NE will seek the advice of its IT provider in ensuring compliance and act as appropriate.
- CECA NE will conduct quarterly data audits to ensure compliance with GDPR.

CECA NE has based this policy document on a suggested template prepared by Vinci Works <https://vinciworks.com/>

CECA has also produced a toolkit for its members on GDPR, which can be found on the members' portal of the website.

CECA NE held a training session for its staff on GDPR in March 2018 and April 2018. Please email: info@ceca-ne.co.uk for a slide pack.