

GDPR POLICY FOR STEVE BREWER EXTERNAL TRANSPORT MANAGER

General Data Protection Regulation 2018

I confirm that Steve Brewer External Transport Manager is compliant with GDPR 2018 act and principles outlined below when it comes to collecting, handling, and storing personal data.

Lawfulness, fairness, and transparency	Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject
Purpose limitation	Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
Data minimization	Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
Accuracy	Personal data shall be accurate and, where necessary, kept up to date
Storage limitation	Personal data shall be 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
Integrity and confidentiality	Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures

Lawful, Fair and Transparent Data Processing

I am responsible as an individual for ensuring that any personal data I hold is processed in accordance with the principles laid out above. I am permitted to process data where one of the following legal bases applies:

1. The data subject has given their **consent**. An example might be where a client/subcontractor has agreed to be contacted about provision of External Transport Manager services in individual or any other capacity.
2. The processing is necessary for the **performance of a contract** to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering a contract with them. An example of this is where I need to retain and file personal information about my clients in order to provide External Transport Manager services and in order for them to decide whether to instruct me or not.
3. The processing is necessary for **compliance with a legal obligation**. An example of this might be where I pass personal data to the Transport Commissioner in a situation where I have an obligation to do so.
4. The processing is necessary to **protect the vital interests of the data subject** or another natural person. An example of this might be where I pass on information to the next of kin of an associate or client who is gravely ill.
5. The processing is necessary for the **performance of a task carried out in the public interest**. This is usually used by public authorities carrying out vital functions such as provision of public utilities or public safety
6. The processing is necessary for the purposes of **legitimate interests**, except where those interests are overridden by the fundamental rights and freedoms of the data subject and their right to privacy in relation to their personal data. An example might be the chasing of a legitimate debt. These legitimate aims may require some processing of personal data which may be justified in that context.

Data Subject Access

“Subject Access Requests” (SARs), can be made by data subjects where an organisation holds personal data about them. This can be done at any time, and the requests are made in order for the data subject to find out what data is being held, and what is being done with it.

1. Such requests need to be made by the data subject in writing
2. They should be addressed to Steve Brewer External Transport Manager, who will deal with the request.
3. Steve Brewer External Transport Manager will usually respond to them within one month, but may need to extend it for a period of up to a further two months if it is a complex request or there are multiple requests. In that situation, the data subject(s) will be informed.

Steve Brewer External Transport Manager will not charge the data subject any fee for responding to the SAR, unless the subject is asking for multiple copies of data already supplied or unless the request is manifestly unfounded or excessive.

Organizational Measures

Steve Brewer External Transport Manager will take the following steps in relation to the collection, holding and processing of personal data:

1. All agents, contractors or other parties working on my behalf will be made fully aware of their individual responsibilities, and the responsibilities of myself, in relation to data privacy and the GDPR and they will be provided with a copy of this Policy
2. In respect of these individuals and of personal data held:
 1. Only those persons who need access to particular personal data in order to complete their assigned duties will be granted such access
 2. All persons will be appropriately trained and supervised in handling personal data
 3. All persons will be encouraged to exercise caution in discussing work-related matters within the workplace
3. All agents, contractors or other parties are bound by strict duties of professional confidentiality in discussing any work related matters outside the workplace, which will be adhered to and enforced
4. My methods of collecting, holding and processing data will be regularly evaluated and reviewed and the personal data held will be reviewed periodically.
5. I will keep the performance of my agents, contractors and third parties under review and, not only will I ensure that they are required to handle personal data in accordance with the GDPR and my Policy, but I will also ensure that they are held to the same standards enforced by myself both contractually and in practice.
6. Where any agent, contractor or third party fails in their obligations under this Policy, I will ensure that they are required to indemnify me for costs, losses, damages or claims which may arise as a result.

Data Breach Notification

All personal data breaches must be reported immediately to the ICO.

If such a breach occurs, and it is likely to result in a risk to the rights and freedoms of data subjects e.g., financial loss, breach of confidentiality, reputational damage, the ICO must be informed without delay and, in any event, within 72 hours of the breach.

Where the breach is likely to result in a high risk to the rights and freedoms of data subjects, I will ensure that the data subjects affected by the breach are informed directly and without undue delay. The following information must be provided:

1. The categories and approximate numbers of data subjects affected
2. The categories and approximate numbers of personal data records concerned
3. My name and contact details.
4. The likely consequences of the breach
5. Details of the measures taken, or proposed, to deal with the consequences of the breach.

Implementation of the Policy

This Policy is effective as of 23rd April 2025. No part of the Policy is retrospective in effect and applies to matters occurring on or after 23rd April 2025.

This Policy has been approved and authorised by:

Steve Brewer External Transport Manager.