



**Any Driver Limited**

**Data Protection Policy**

This Policy sets out Any Driver Ltd.'s commitment to protecting personal data and how Any Driver Ltd implements that commitment with regards to the collection and use of personal data.

Any Driver Ltd is committed to:

- Meeting its legal obligations as laid down by the General Data Protection regulations (GDPR).
- Ensuring that it complies with data protection principles, contained within GDPR, as listed below:
  - Personal data shall be processed fairly and lawfully.
  - Personal data shall be obtained for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
  - Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
  - Personal data shall be accurate and, where necessary, kept up to date.
  - Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
  - Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998.
  - Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
  - Personal data shall not be transferred to a country or territory outside the EEA (European Economic Area) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
- With effect from May 2018, meeting the requirements of the General Data Protection Regulation (GDPR).
- Processing personal data only in order to meet our operational needs or fulfil legal requirements.
- Taking steps to ensure that personal data is up to date and accurate.
- Establishing appropriate retention periods for personal data.
- Ensuring that data subjects' rights can be appropriately exercised.
- Providing adequate security measures to protect personal data.
- Ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues.
- Ensuring that all staff are made aware of good practice in data protection.
- Providing adequate training for all staff responsible for personal data.
- Ensuring that everyone handling personal data knows where to find further guidance.
- Ensuring that queries about data protection, internal and external to the

organisation, are dealt with effectively and promptly.

- Regularly reviewing data protection procedures and guidelines within the organisation.

### **Who is affected by this Policy?**

Full and part-time employees, volunteers, suppliers, contractors and consultants of Any Driver Ltd.

### **Any Driver Ltd Directors & Managers**

- Create the working environment which encourages everyone to take personal responsibility for their actions.
- Comply with the Data Protection Guidance Notes.
- Create policies, plans and procedures that enable staff to be empowered in line with our values and code of conduct.
- Undertake appropriate data protection awareness training.
- Demonstrate top management level commitment to compliance with the GDPR demonstrating its explicit commitment to implement the provisions of the GDPR.
- Monitor and review this Policy and the Data Protection Guidance Notes to ensure that they comply with current UK legislation and regulations and are in line with best practice.

### **Employees, volunteers, suppliers, contractors and consultants**

- Understand and adhere to this policy and all relevant legislation.
- Undertake appropriate data protection awareness training.
- Comply with the Data Protection Guidance Notes.

### **Non-compliance**

Failure to comply with this Policy and its associated guidance notes could result in disciplinary action being taken against the employee concerned. In certain circumstances, employees could be held criminally liable if they knowingly or recklessly disclose personal data in contravention of Any Driver Ltd.'s procedures (which include this Policy). Such action may, in extreme cases, be treated as gross misconduct which could result in summary dismissal.

### **Review and revision**

This Policy will be revised as and when required to take account of developments in legislation, business need and technology.



## **Data Protection Register**

As we are a Company that processes personal data, we are required to be registered with the Information Commissioner's Office, which is an independent authority that regulates and enforces the Act.

All companies must renew their notification with the Information Commissioner's Office on an annual basis. Failure to notify constitutes a criminal offence.

It is our Data Controller's responsibility for the annual renewal. Our Data Protection Register numbers are as follows:

Any Driver Ltd: Registered 25<sup>th</sup> March 2014      Reg Number: ZA049069