



# **APEM Ltd**

# **Data Privacy Policy**

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## Revision and Amendment Register

| Version Number | Date       | Section(s) | Page(s) | Summary of Changes   | Approved by   |
|----------------|------------|------------|---------|--|---|
| 1              | 24/05/2018 | All        | All     | Updated to comply with new GDPR legislation.   | Adrian Williams   |
| 2              | 16/07/2019 | All        | All     | External review by Rachel Mariner to ensure compliance with GDPR;<br>Distinguished Privacy Policy from Privacy Notice;<br>Included information on DPO. | Amendments reviewed by Joanne Hickman<br>Approved by Adrian Williams                |
| 3              | 22/04/2020 | All        | All     | Annual review;<br>Included information on cloud-based servers.   | Amendments reviewed by James Burton and Richard Peck<br>Approved by Adrian Williams |

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## 1. Introduction

This revision of the APEM privacy policy relates to the changes made in preparation for the General Data Protection Regulation (GDPR) in May 2018.

In this preparation for GDPR, APEM has made some changes to the business that affect the way we now handle data. These changes have been made to improve both privacy and data handling generally. Our approach has been to examine the potential risks to data subjects where the impact of a data breach on the data subject has been considered high. APEM has put measures in place to reduce this to an acceptable level.

APEM is not a public authority or body whose core activities involve processing personal data on a large scale and therefore does not need to appoint a Data Protection Officer. However, APEM does have an internal staff member who oversees compliance with data protection regulations who will work alongside APEM's Data Controller and monitor internal compliance with the GDPR and our own data protection policies. They can be contacted at: [data.protection@apemltd.co.uk](mailto:data.protection@apemltd.co.uk).

## 2. Data held by APEM

We hold data about customers, potential customers, our employees and from our website as follows:

### 2.1 Client and potential client data

- Company name;
- Contact name;
- Contact address;
- Contact telephone number (mobile and landline);
- Contact email address;
- Contract details (where appropriate);
- Customer owned data which is related to a project.

### 2.2 Employee Data

- Employee name;
- Employee address;
- Employee National Insurance Number
- Employee bank details;
- Employee emergency contact details;
- Data for company insurance policy.

## 2.3 Website Data

- Internet Protocol (IP) Address;
- Cookie data;
- Data supplied by website users via the online enquiries form

## 3. What we use the data for

### 3.1 Client and potential client data

- Contact name to address clients, or potential clients directly;
- Contact address to address clients, or potential clients directly;
- Contact telephone number (mobile and landline) to address clients, or potential clients directly;
- Contact email address to address clients, or potential clients directly;
- Contract details (where appropriate) to provide the appropriate services to our clients;
- Project details (where appropriate) to provide support applicable to the client contract;
- Customer owned data, which is related to a project, to resolve a specific support issue.

Under the banner of legitimate interest, client data is also used for marketing, including email marketing. Clients can unsubscribe from receiving email marketing at any time.

### 3.2 Employee data

- Employee name;
- Employee address;
- Employee email address;
- Employee National Insurance Number;
- Employee bank details;
- Employee salary and pension information
- Employee driving licence details;
- Employee car insurance details;
- Employee emergency contact details (next of kin);
- Company insurance policy details
- Employee pension contribution
- Employee health insurance premiums
- Employee health insurance reimbursement
- Employee performance reviews.

All employee data is held for the purposes of employment, insurance, payment and compliance with tax and pension payments. It is kept on the secure server in Stockport and access to this information is strictly limited.

### 3.3 Website Data

- We do not send customers information based on their IP addresses. If they have a query, we ask them to fill out a short form with their email address so we can get back to them directly.
- Cookie data. We collect data about visitors to our website and browsing patterns. This data is only used in anonymous form and individuals are not identified. For more details see our Cookie Policy.

## 4. Storage of data

APEM's physical servers are located in a secure server room at company Headquarters.

APEM's cloud servers are hosted within Microsoft Azure. This is a cloud-based server solution hosted in Microsoft data centres in the UK. These data centres are maintained and protected by Microsoft, in-line with industry standard legislation.

Data gathered via the company website is held on secure servers by our website service provider.

Data stored locally is held on APEM owned equipment. Security of that data complies to the Government backed Cyber Essentials Scheme which includes:

- Secure boundary controls between APEM and the internet.
- Controls on access to the data. Access is restricted to only those persons authorised to see the data.
- Up to date antimalware protection to reduce the risk of data being damaged by malicious software.
- Regular patching of our software and operating systems to further reduce the risks of a malicious software attack.
- Secure configuration of our devices removing any known weaknesses.

## 5. Sharing of data

APEM will only share data in the following situations, with the employee's permission:

- When required for performance of a contract.
- When required for optional employee benefits such as the pension scheme.

Other than for the purposes highlighted above APEM will not share your details with any other third parties.

## 5.1 Transportation of Data

When APEM transfer data, it is done with secure connections. Any personal data held by APEM does not leave the EU without consent.

## 6. Data retention

### 6.1 Client and potential client data

All client data is securely destroyed seven years after our last contact with the client company, or for as long as the contract stipulates where this exceeds seven years.

### 6.2 Employee and potential data

To stay in line with the various regulations covering payroll, pension, contract and employee data and, to maintain a system that is not overly burdensome to manage, APEM will keep all employee data for seven years after the employee leaves the organisation. Data collected during the application process will be deleted after a year if the candidate is unsuccessful.

### 6.3 Client data used in projects

Where possible, APEM will avoid copying any client data. However, in situations where this is not possible, the data will be destroyed or returned to the customer on closure of the project.

## 7. Communicating with you

APEM will communicate with you to:

- Inform you of new or improved services offered by APEM;

Customers may opt out of the communications at any time by following the instructions in the specific message.

## 8. Correction of Data and Subject Access Requests

If the data we hold about you is incorrect, please contact: [dataprotection@apemltd.co.uk](mailto:dataprotection@apemltd.co.uk) stating what the problem is and what correction is required. It would aid our investigation if you could provide a screen shot of the issue.

Customers and potential customers have the right to receive a copy of their data held by us. Please send an email to [dataprotection@apemltd.co.uk](mailto:dataprotection@apemltd.co.uk) to make your request.

## 9. Issues or comments on this Privacy Statement

If you have any issues or concerns with this Privacy Statement, or the way APEM handles data, please contact: [dataprotection@apemltd.co.uk](mailto:dataprotection@apemltd.co.uk)