

**DATA PROTECTION POLICY**Issue No: 02  
Issue Date: 29/09/2023

Haigh Rail recognise that to carry out its services, it must collect and use personal data relating to the people with whom and for whom it works. 'Personal data' means any information relating to a living individual from which that individual may be identified (including, for example, their name, address, or payroll number), whether by itself or taken together with other information in the possession of Haigh Rail.

Haigh Rail will manage any personal data in accordance with the General Data Protection Regulations 2018 and other related legislation, in whichever manner that such data is collected, recorded, or used (whether on paper, databases, emails, CCTV or telephone records, or recorded by any other means). Haigh Rail follows the 7 data protection principles set out in the General Data Protection Regulations 2018 and understands its obligations to ensure that personal data is managed fairly, lawfully, accurately, and securely. These principles require that personal data, including that of its employees and third parties **must be**:

- Lawfulness, fairness, and transparency.
- Purpose limitation.
- Data minimisation.
- Accuracy.
- Storage limitation.
- Integrity and confidentiality (security).
- Accountability.

Haigh Rail holds Personal Data which is directly relevant to its employees. That data will be held and processed in accordance with the data protection principles above and with this Policy. The following data may be collected, held, and processed by Haigh Rail:

- Identification information relating to employees including, but not limited to, names and contact details.
- Equal opportunities monitoring information including age, gender, race, nationality, and religion.
- Health records including details of sick leave, medical conditions, disabilities, and prescribed medication.
- Employment records including, but not limited to, interview notes, curricula vitae, application forms, assessments, performance reviews and similar documents.
- Details of salaries including increases, bonuses, commission, overtime, benefits, and expenses.
- Records of disciplinary matters including reports and warnings, both formal and informal.
- Details of grievances including documentary evidence, notes from interviews, procedures followed and outcomes.

Implementation of the Data Protection Principles will be achieved by Haigh Rail ensuring that:

- Internal and external individuals are available to provide advice and assistance on issues arising under the Data Protection Act.
- Everyone managing and handling personal information understands they are responsible for following good data protection practice and is appropriately trained and supervised.
- Personal data will only be accessed by those authorized to do so.
- Appropriate efforts will be made to ensure that all stored data is accurate and updated as necessary, password protected and that data which is obsolete or no longer required is destroyed with appropriate regard paid to the confidentiality of that information.
- A regular review is made of the way personal information is managed.

The responsibility for compliance primarily rests with Haigh Rail. However, every employee has an individual responsibility to ensure compliance and can be held legally accountable.

Signed:



(Managing Director) Dated: 29/09/2023