

## Information Security Policy

This policy sets out how Johns of Nottingham Ltd uses and protects any information that you give to us, as part of this, we recognise that we have a responsibility to protect all the data we hold or process whether it belongs to us, our employees, customers or suppliers.

It is the responsibility of all our staff, regardless of grade to become familiar with our security processes and to comply with all information security and privacy policies and our procedures.

We commit to ensure that our systems and processes are efficient, effective and are continuously reviewed to protect any data we hold or process while avoiding the reputational financial and legal harm that would result from a data breach.

The Board fully support the information security and require all staff, whether permanent or temporary, suppliers, contractors and subcontractors to do the same.

It is the goal of the Johns of Nottingham that:

- Information will be protected against unauthorised access or misuse.
- Confidentiality of information will be secured.
- Integrity of information will be maintained.
- Availability of information / information systems is maintained for service delivery.
- Business continuity planning processes will be maintained.
- Regulatory, contractual and legal requirements will be complied with.
- Physical, logical, environmental and communications security will be maintained.
- All information security incidents will be reported and investigated through the appropriate management channel.

Information relates to:

- Electronic information systems (software, computers, and peripherals) owned by Johns of Nottingham whether deployed or accessed on or off premises.
- The computer network used either directly or indirectly.
- Hardware, software and data owned by Johns of Nottingham.
- Paper-based materials.
- Electronic recording devices (video, audio, CCTV systems)

### ***The Policy***

Johns of Nottingham requires all users to exercise a duty of care in relation to the operation and use of its information systems.

#### **Authorised users of information systems**

With the exception of information published for public consumption, all users of Johns of Nottingham information systems must be formally authorised by appointment as a member of staff, or by other process specifically authorised by Johns of Nottingham. Authorised users will be in possession of a unique user identity. Any password associated with a user identity must not be disclosed to any other person.

Authorised users will pay due care and attention to protect information in their personal possession. Confidential, personal or private information must not be copied or transported without consideration of:

- permission of the information owner
- the risks associated with loss or falling into the wrong hands
- how the information will be secured during transport and at its destination.

#### **Acceptable use of information systems**

Use of the Johns of Nottingham information systems by authorised users will be lawful, honest and decent and shall have regard to the rights and sensitivities of other people.

## Information System Owners

Johns of Nottingham ensures that those responsible for the information systems are required to ensure that:

1. Systems are adequately protected from unauthorised access.
2. Systems are secured against theft and damage to a level that is cost-effective.
3. Adequate steps are taken to ensure the availability of the information system, commensurate with its importance (Business Continuity).
4. Electronic data can be recovered in the event of loss of the primary source. I.e. failure or loss of a computer system. It is incumbent on all system owners to backup data and to be able to restore data to a level commensurate with its importance (Disaster Recovery).
5. Data is maintained with a high degree of accuracy.
6. Systems are used for their intended purpose and that procedures are in place to rectify discovered or notified misuse.
7. Any electronic access logs are only retained for a justifiable period to ensure compliance with the data protection, investigatory powers and freedom of information acts.
8. Any third parties entrusted with Johns of Nottingham data understand their responsibilities with respect to maintaining its security.
9. Software security patches are assessed and triaged as they are released, then assigned to a patch window according to the assessed risk and business impact.
10. All new software that interacts with customer data are risk assessed via Data Protection Impact Assessment (DPIA) prior to implementation

## Personal Information

Authorised users of information systems are not given rights of privacy in relation to their use of Johns of Nottingham information systems. Duly authorised officers of Johns of Nottingham may access or monitor personal data contained in any Johns of Nottingham information system (mailboxes, web access logs, file-store etc).

Individuals in breach of this policy are subject to disciplinary procedures at the instigation of the Director with responsibility for the relevant information system.

Johns of Nottingham will take legal action to ensure that its information systems are not used by unauthorised persons.

## Ownership

The Data Controller has direct responsibility for maintaining this policy and providing guidance and advice on its implementation.

Information system owners are responsible for the implementation of this Policy within their area, and to ensure adherence.

## Privacy Policy

This policy sets out how Johns of Nottingham Ltd uses and protects the privacy of any information that we hold whether provided directly or indirectly to us, as part of this, we recognise that we have a responsibility to protect all the data we hold or process whether it belongs to us, our employees, subcontractors, customers, clients or suppliers.

Should we ask you to provide certain information by which you can be identified when using our services, then you can be assured that it will only be used in accordance with this privacy statement.

Johns of Nottingham Ltd may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

Johns of Nottingham Ltd recognizes The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) effective from the date of 25th May 2018 and our compliance with that directive.

### What we collect

You can visit our website without revealing who you are or providing any personal information about yourself. If you do submit any personal information, by doing so you give your consent to such data being processed by us for the purpose that it was provided.

Personnel information may have been provided directly by you or it may have been provided by a third party to ourselves due to business relationship, in the course of us providing a service on a legitimate basis.

Closed circuit television may record both you and our staff when visiting our premises for the reasons of security. This data will not be stored for longer than is necessary for the purposes it was collected.

### We may collect the following information when provided:

- name
- contact information including email address and phone numbers
- demographic information such as postcode, preferences and interests
- Copies of documents, Quotations, Insurances, Start Letters, Satisfaction notes
- Information provided by a third party on your behalf
- Surveys, Plans, Drawings, Specifications of Domestic and commercial properties
- Photographic or video images
- other information relevant vacancies, enquiries or payment information

### What we do with the information we gather

Any information that we gather when you use our website shall be fairly and lawfully processed for the purpose it was originally intended. You have the facility to submit a limited amount of personal contact data about yourself in the course of accessing our website. This may be used to help improve our web site or the products or services we offer; or to understand better your needs.

Your information will not be used for marketing purposes or transferred to a third party unless in direct relation to your enquiry or request due to a business relationship on a legitimate basis and will not be kept lawfully for longer than necessary.

We may use the information you submit in order to process or respond to your enquiry or request; to comply with any relevant law, regulation, audit or court order.

A limited amount of personal information provided by you may be used in order to process your enquiry or request. We may also use this information to communicate with you about services provided to you or services provided to us. Contact to you may be made by email, mail, phone or text messaging.

Third party clients to ourselves may ask us to contact you on their behalf for the purposes of providing consultancy or a service on a legitimate basis.

We will only keep your data for as long as is necessary, for the purpose of which it was collected or provided. Once your data is no longer required for statutory or legal basis your information will be destroyed deleted or anonymised.

## **Subcontractors and Freelance Operatives**

On the occasion when a Subcontractor or Freelance operative is engaged by ourselves for the purpose of carrying out a service on our behalf only a limited amount of personnel low risk information will be provided to them on the basis of them carrying out their duties. Due care and attention to protect any information in their personal possession must be taken at all times and this data must not be copied in any format. Once these duties are complete other than for the reason a business transaction existed or on a legitimate basis for the provision of warranties or guarantees. All information must be securely destroyed or returned to our offices for assessment by the relevant controller, so the data is kept no longer than necessary.

A Subcontractors or Freelance Operatives own personnel information or data will also be gathered and used by Johns of Nottingham on the same basis as set out in this privacy policy.

## **Third Parties**

We work with various third-party companies of which the same data principles apply as set out in this privacy policy. Information is only provided to them, so they can perform the specific service requested by ourselves. They may only use the data for the exact purpose it was provided. Due care and attention to protect any information provided must be taken at all times.

## **Safety of your data**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information that may be collected. We also have in place stringent processes for the data deletion and data destruction once your information is no longer required for retention or any other statutory requirements.

## **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **Controlling your personal information**

We will not sell, distribute or lease your personal information to third parties unless we are required by law to do so.

If you believe that any information we are holding on you is incorrect or incomplete, please contact us as soon as possible. We will promptly correct any information found to be incorrect.

## **Withdrawal of consent**

Whenever you have given us permission to use your personnel information you have a right to withdrawal consent at any time. We must do so unless we believe we have an overriding legitimate reason to continue using your personnel information of which a reason will be provided to you.

## **Rights of Access to Information**

Data subjects have the right of access to information held by Johns of Nottingham Ltd under the General Data Protection Regulation (GDPR), Johns of Nottingham Ltd will endeavour to respond to any such requests as soon as is reasonably practicable and, in any event, within 30 days for subject access requests in respect of personnel Data. The information will be imparted to the data subject as soon as is reasonably possible after it has come to Johns of Nottingham Ltd attention and in compliance with the relevant Acts. We may request the provision of further information to confirm the identity of the data subject prior to the release of information to the data subject.

### **Registered Office:**

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