



## **DATA PROTECTION POLICY STATEMENT**

AIR-serv is committed to a policy of protecting the rights and privacy of individuals (Data Subjects), and others in accordance with General Data Protection Regulation (EU) 2016/679. This policy applies to all Employees, Data Controllers and Processors working for or on behalf of AIR-serv.

As a matter of good practice, other organisations and individuals working with AIR-serv, and who have access to personal information, will be expected to have read and comply with this policy. It is expected that any Employees, Data Controllers and Processors working for or on behalf of AIR-serv who deal with external organisations will take responsibility for ensuring that such organisations sign a contract agreeing to abide by this policy.

### **Legal Requirements**

Data subjects are protected by the General Data Protection Regulation (EU) 2016/679, which came into effect on 25th May 2018. Its purpose is to protect the rights and privacy of individuals and to ensure that personal data are not processed without their knowledge, and, wherever possible, is not processed without their consent.

### **Managing Data Protection**

We will ensure that our details are registered with the Information Commissioner's Office.

### **Purpose of data held**

Data may be held by us for the following purposes:

1. Employee & Sub-contractor Administration
2. Training Delegate Personal information
3. Accounts & Records
4. Advertising, Marketing & Public Relations
5. Processing credit card payment & direct debit purposes
6. Obtaining credit checks

### **Data Protection Principles**

In terms of the General Data Protection Regulation (EU) 2016/679, we are the 'data controller', and as such determine the purpose for which, and the manner in which, any personal data are, or are to be, processed. We must ensure that we have:

- 1. Fairly and lawfully processed personal data**  
AIR-serv use and retain personal data in order to conduct their business, deliver services and fulfil their contractual obligations to their customers.
- 2. Processed for limited purpose**

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Personal data will only be used in the course of the work we carry out for you and it will be retained for as long as we are contracted to provide services to you and to otherwise comply with legal requirements relating to the retention of company records.

3. **Adequate, relevant and not excessive**

AIR-serv will monitor the data held for our purposes, ensuring we hold neither too much nor too little data in respect of the data subjects about whom the data are held.

4. **Accurate and up-to-date**

All amendments will be made immediately, and data no longer required will be deleted or destroyed. It is the responsibility of individuals and organisations to ensure the data held by us are accurate and up-to-date. Individuals should notify us of any changes, to enable personal records to be updated accordingly.

5. **Not kept longer than necessary**

We discourage the retention of data for longer than it is required. All personal data will be deleted or destroyed by us in accordance with our Document & Records Retention guidelines.

6. **Processed in accordance with the individual's rights**

All individuals that AIR-serv hold data on have the right to:

- Be informed upon the request of all the information held about them within 30 days.
- Prevent the processing of their data for the purpose of direct marketing.
- Compensation if they can show that they have been caused damage by any contravention of the General Data Protection Regulation (EU) 2016/679
- The removal and correction of any inaccurate data about them.

7. **Secure**

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data.

This policy shall be reviewed annually in the event of a required change.

**Simon Pope**

**CFO**

**25 March 2019**