

Data Protection Policy

**Date: May 2022**

**Date of Next Review: May 2024**

## **Introduction**

This policy relates to Company practices covered under the Data Protection Act 1998 and the EU General Data Protection Regulations 2018 (GDPR) where personal data is defined as:

*"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".*

Swift Removals provides a removals and storage service. We take our client's privacy seriously and will only use their personal information to administer their account and to provide the products and services they have requested from us and we have agreed to provide.

Our business ethos and principles dictate that we will not share any personal data with third-parties, this includes use for our marketing purposes, unless we have expressly agreed such with our clients, for example for our client testimonials on our website.

All our employees and sub-contracted staff who handle personal data have agreed to the terms of our Data Protection Policy and have a responsibility to comply with it accordingly.

Mr Gareth Peers is our appointed Data Protection Officer.

### **1. What personal data do we collect**

#### **Removals Service**

It is the nature of the removal service we provide, that requires us to collect and process personal data.

- **Information a client gives us.** This is information that our client and/or their family give us by filling in forms on our websites or by corresponding with us by phone, e-mail or otherwise. This includes when a client/potential client uses our website or inquires about, or uses, any of our removals services. The information may include their and /or their family's name, e-mail address, phone number or other contact details and origin and destination addresses.

It may also include lists of a client's personal belongings and household effects. (Appendix 1 – Documents showing personal data).

- Clients are not required to supply any of the information that we may request, however, this would limit the services we are able to offer them. Whilst we make every effort to ensure that client's data is accurate, complete and up to date, they can help us considerably in this by promptly notifying us if there are any changes to their data.
- We request that clients do not provide us with the personal data of anyone else without their permission, unless they have obtained the explicit consent from that person.

### **Storage Service**

Where we store archived material on a client's behalf, these items will be secured in dedicated containers inside our Warehouse. We will have no need to access any of these confidential documents. All the time they are in our possession, they remain the property of our client and all employees understand that the contents remain confidential to the client. We reference the materials by Box Number alone and no record of any personal data, other than, for example, client/company name will be held by us.

The Warehouse storage facility is alarmed with a link to police response.

Access is restricted to nominated key holders, all of whom are direct employees of the Company.

## **2. How we use personal data**

We limit the use of personal data to ensuring we deliver the service a client has requested, and we have agreed to provide. Furthermore, we retain personal data only for as long as is necessary to deliver this service. Under certain circumstances we will retain personal data longer if it forms part of an accounting record which we are obliged by law to retain for 7 years. Where this is the case, personal data will be archived and stored in our secure Warehouse. Records in an archived state means access to them is greatly restricted.

After this period, we securely destroy records personal data is contained within (e.g. quotations, job cards, acceptance of removals terms and invoices – Appendix 1), in line with our retention schedule. Destruction of paper records is done securely and appropriately.

For example, we securely shred paper records in line with the British Standard for secure destruction of confidential material (BS EN 15713), or where specifically requested arrange for secure disposal, in accordance with relevant Waste regulations in our capacity as a registered waste carrier/broker.

### **3. Disclosure of personal data**

If another organisation helps us to provide the service, we may also make a client's personal data available to them. Appendix 2.

We will only disclose personal data to third parties in circumstances that are necessary for delivering the service agreed with our clients e.g. to overseas companies who will be carrying out the destination services of the international move.

### **4. Security and use of personal data**

#### **We will never sell personal data.**

Unfortunately, no data transmission over the internet or any other network can be guaranteed as 100% secure, but we take appropriate steps to try to protect the security of all personal data. Software solutions are in place which constantly scan for malware and viruses.

Personal data will not be disclosed to unauthorised people, either within the Company or externally.

Staff holding personal data on Company mobile phones (telephone numbers, email addresses) will use a strong password for their device which will not be shared with any 3rd party.

All staff are required to ensure that any paper files not in current use are stored in filing cabinets and locked at all times when offices are unoccupied.

Regular reviews of documents containing personal data will be undertaken, and if no longer needed, will be deleted, or if contained on paper; shredded once it becomes superfluous. (see Section 2).

Where we store archived documents on behalf of our clients, which may contain 3rd party personal data: see Section 1 regarding the security of such data.

If there are attacks on our services, or other criminal activity, we may share information with the police or similar public bodies, as required by the GDPR or other legislation.

In the event of a data breach involving a client's personal data which presents a high risk, we will contact you immediately.

## **5. Responsibilities**

All Swift Removals employees have a responsibility for ensuring personal data is collected, stored and handled appropriately. Appendix 2

The only people able to access data covered by this policy will be those that need it to undertake their role and provide the agreed service. Where access to confidential information is required, employees can request it from the Data Protection Officer.

Training will be given to all employees to ensure they understand their responsibilities when handling personal data and, in particular, complying with Section 4 of this policy.

## **6. How to contact us and exercise your rights**

Under the Data Protection Act 1998 and the superseding GDPR, you have certain rights over your personal data that we hold. You can:

- ask to receive a copy of your personal data in our possession;
- ask us to correct any errors; and
- seek confirmation that we will delete it once we no longer need it.

To contact us regarding these rights, please write to our Data Protection Officer, Gareth Peers.

### **Contact Details**

Swift Removals and Storage Uk Limited  
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01684 439585