

## 1. Introduction

Tensor REC needs to collect and use certain types of information about the individuals or service users who come into contact with Tensor REC in order to carry on our work. This personal information must be collected and dealt with appropriately whether it is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the General Data Protection Regulation.

## 2. Data controller

Tensor REC is the data controller under the GDPR, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

## 3. Data collection

Tensor REC regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

Tensor REC intends to ensure that personal information is treated lawfully and fairly.

To this end, Tensor REC will adhere to the Principles of Data Protection, as detailed in the GDPR.

Specifically, the principles require that personal information:

“processed lawfully, fairly and in a transparent manner in relation to individuals;  
collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;  
adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;  
accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;  
kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and  
processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Tensor REC will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information.
- Meet its legal obligations to specify the purposes for which information is used.
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements.
- Ensure the quality of information used.
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
  - The right to be informed that processing is being undertaken.
  - The right of access to one’s personal information.
  - The right to prevent processing in certain circumstances.
  - The right to correct, rectify, block or erase information which is regarded as wrong.
  - The right to be forgotten, in certain circumstances.
  - The right to have data transferred to a third party.
- Take appropriate technical and organisational security measures to safeguard personal information.
- Ensure that personal information is not transferred outside the EU without suitable safeguards.
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.
- Set out clear procedures for responding to requests for information.

#### **4. Disclosure**

Tansor REC may share data with other agencies such as the local authority, police forces, other enforcement agencies, insurance providers and other service providers as required. The data subjects will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows Tansor REC to disclose data (including sensitive data) without the data subject's consent.

These are:

- Carrying out a legal duty or as authorised by the Secretary of State.
- Protecting vital interests of an individual/service user or other person.
- The individual/service user has already made the information public.
- Conducting any legal proceedings, obtaining legal advice or defending any legal rights.
- Monitoring for equal opportunities purposes – i.e. race, disability or religion.
- Providing a confidential service where the individual/service user's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill individuals/service users to provide consent signatures.

#### **5. Data storage**

Information and records relating to service users will be stored securely and will only be accessible to authorised staff or other authorised persons.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is Tansor REC's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

#### **6. Data access and accuracy**

All individuals/service users have the right to access the information Tansor REC holds about them. Tansor REC will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, Tansor REC will ensure that:

- Everyone processing personal information understands that they are contractually responsible for following good data protection practice.
- Everyone processing personal information is appropriately trained to do so.
- Everyone processing personal information is appropriately supervised.
- Anybody wanting to make enquiries about handling personal information knows what to do.
- It deals promptly and courteously with any enquiries about handling personal information.
- It describes clearly how it handles personal information.
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact Tansor REC directly;

[info@tansorrec.co.uk](mailto:info@tansorrec.co.uk)

020 3823 3421