



**Environmental  
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## **ANTI-BRIBERY POLICY**

*At Geo Pollution Technologies, we recognise that bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust.*

*To clarify:-*

*A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.*

*It is our policy to conduct all of our business in an honest and ethical manner.*

*We take a zero tolerance approach to bribery and corruption.*

*We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.*

*We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.*

*However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both within the UK and abroad.*

*Bribery and corruption are punishable for individuals by up to ten years imprisonment and a fine.*

*Any employee that is approached by a third party to undertake any kind of activity involving bribery, must report it immediately, failure to do so will be subject to disciplinary action.*

*If we are found to have taken part in corruption, we understand that we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation.*

*We therefore take our legal responsibilities very seriously.*

Signed

Date: **04/2018**

*Ian McDonald – Managing Director*

*Next Review Date: **04/2019***

**Geo Pollution Technologies (UK) Limited**



## **ANTI-CHILD LABOUR POLICY**

### **1. Introduction**

#### ***Defining Child Labour***

*Child Labour represents hazardous forms of work that disrupt the healthy development of a child. Child labour can limit or damage the physical, mental, social or psychological development of children and undermine a child's right to childhood, development and education. The company recognizes its responsibility to take an effective role in reducing child labour.*

#### ***Hazardous work***

*Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18 or (16 under strict conditions)*

#### ***Basic Minimum Age***

*The minimum age for work should not be below the age for finishing compulsory schooling, which is generally 16.*

#### ***Light work***

*Children between the ages of 13 and 16 years old may do light work, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training.*

***Geo Pollution Technologies (UK) Ltd*** is firmly committed to creating strong business growth, which is not achieved at the expense of the environment, quality of life or social equity. The Company will comply with all relevant and applicable local and international labour regulations, treaties, conventions and principles relating to the protection, welfare and health & safety of children. Furthermore, the Company will not employ any person deemed by local or international laws, conventions or regulations to be a child in any capacity in any industrial operation under its control.

***Geo Pollution Technologies (UK) Ltd*** acknowledges that in the course of carrying out its basic duties; without the knowledge of management; employers may indulge their children; it is sometimes customary for children to play a part in the day-to-day work for the fun of it due to the fact that children have an affinity for work and activity. Nevertheless, the Company aims to apply this anti-child labour policy through education and strict supervision seeking to ensure that:

- a) *The welfare and health & safety of children are paramount at all times.*
- b) *Any forms of practice undertaken by children for the development of craft skills and for the purposes of play do not conflict with or impede their proper educational development including school attendance.*

*The objective of the policy is to set out the ways in which the company will:*

- *Prevent child labour within its operations and supply chain*
- *Approach incidences where child labour is identified*

## **2. Implementation**

### ***Efforts to Reduce the Engagement of Child Labour in the Taskforce***

- *Comply with national law on child labour and minimum age.*
- *Comply with the Convention on the Rights of the Child.*
- *Not use or support the use of child labour*
- *Prohibit and seek to eliminate the worst forms of child labour*
- *Not work with those who use child labour – unless an elimination plan is in place.*
- *Base decisions about child labour on expert advice about the options available to children in the local context, and the best interests of the children affected*
- *Educate employees and all staff on child labour and its negative impacts in the work environment and on society as a whole.*

### ***Education and vocational work for children***

*Promote education for children of school age via the use and promotion of work experience among other initiatives.*

Signed



*Ian McDonald – Managing Director*

*Date: 04/2018*

*Next Review Date: 04/2019*

***GEO Pollution Technologies (UK) Ltd***



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## **ANTI-SLAVERY AND HUMAN TRAFFICING POLICY**

### ***Definition***

*Modern slavery is a crime and a violation of fundamental human rights in both law (Modern Slavery Act 2015) and moral obligation. It can take various forms, such as slavery, servitude, forced & compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or financial gain.*

### ***Policy Statement***

*GPT have a zero tolerance attitude to modern slavery and we are committed to acting ethically & with integrity in all our business activities and relationships. While implementing effective systems and control measures to ensure modern slavery is not taking place anywhere within our own business or in any of our supply chains.*

*GPT are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our directly employed staff, contractors, suppliers and other business partners.*

### ***Implementation***

*This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.*

*The managing director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Compliance Manager has the day today responsibility for implementation and effectiveness of the policy.*

Signed

Ian McDonald – Managing Director

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**



# Environmental Management Services

## **Carbon Footprint Policy**

*It is the stated policy of Geo Pollution Technologies (GPT) to reduce its environmental impact where practicable.*

*Carbon reducing measures form an integral part of the overall Company strategy, helping to improve both operational performance and a reduction in potentially harmful emissions to land, water and air. The company's ultimate aim is to reduce its carbon footprint to the lowest possible figures achievable by December 2020, or before, where practical.*

***To help achieve this, the company will;***

- *Comply with all current energy legislation, seeking to meet or better legislative targets*
- *Minimise waste, promote recycling, and use of recycled products to help reduce the burden on landfill, and therefore methane generation.*
- *Continue to promote and design energy efficient and therefore carbon reducing systems and equipment on behalf of our clients.*
- *Promote environmental awareness and responsibility amongst employees and others, and will seek, where practicable, to continuously improve company environmental performance.*
- *Continue to monitor Environmental performance of the business via KPI's*
- *Completion of performance reviews for the benefit of our clients and stakeholders.*

*This carbon footprint policy statement underpins the existing environmental, sustainable procurement and waste management policy*

Signed

Ian McDonald – Managing Director

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**



**Environmental  
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## **Counterfeit, Fraudulent and Suspect Items (CFSI) Policy**

*At Geo Pollution Technologies (GPT) we understand that safety can be compromised during the use of counterfeit or fraudulent equipment. Safety is our overriding priority and we regard the cooperation of our supply chain throughout the tiers as essential to maintain the highest standards for all the goods and services we supply and/or use.*

*Geo Pollution Technologies (GPT) management understand the potential risks concerning the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) within the supply chain and directly to our employees. In order to mitigate the effects of CFSI we only promote the use of suppliers that can demonstrate the quality and source of the goods that we require.*

*All our employees involved in the purchasing or hiring of goods have been informed about the potential for CFSI and are advised that all goods must be either purchased or hired directly from the manufacturers or from a reputable and official distribution channels.*

Signed

*Ian McDonald – Managing Director*

*Date: 06/2018*

*Next Review Date: 06/2019*

***GEO Pollution Technologies (UK) Ltd***



**Environmental  
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## **Diversity and Equality Policy**

*The purpose of this policy is to provide diversity and equality to all in employment, irrespective of their gender, race, ethnic origin, disability, age, nationality, national origin, sexuality, religion or belief, marital status and social class. We oppose all forms of unlawful and unfair discrimination.*

*All employees, whether part time, full time or temporary, will be treated fairly and equally.*

*Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.*

*All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.*

### ***Our commitment:***

- *Every employee is entitled to a working environment which promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.*
- *The commitment to diversity and equality in the workplace is good management practice and makes sound business sense.*
- *Breaches of our diversity and equality policy will be regarded as misconduct and could lead to disciplinary proceedings.*
- *This policy is fully supported by all staff and including the management and the managing director.*
- *The policy will be monitored and reviewed annually.*
- *The policy is implemented by making all employees aware of our policy and ensuring they abide by it. On the policies enactment all employees were given a copy and a copy is clearly presented in our foyer.*
- *If any employee feels that they or any other member of staff has been treated in a way which breaches this policy complaints should be made to a member of the management team.*

### ***The law***

*This policy will be implemented within the framework of the Equalities Act (2010)*

Signed  
Ian McDonald – Managing Director

Date: **04/2018**  
Next Review Date: **04/2019**

**GEO Pollution Technologies (UK) Ltd**



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## **ALCOHOL AND DRUGS POLICY**

### **Purpose and scope**

*In this policy:*

1. 'staff' refers to all individuals working for us at every level or grade, whether they are directors, officers, partners, employees, workers, contractors, consultants, agency workers, volunteers, trainees or on work experience.
2. 'drugs' refers to controlled substances, and prescribed or over-the-counter medication and legal highs which are being, or are intended to be, misused or used contrary to medical instructions or advice.
3. 'controlled substances' refers to drugs that are unlawful under criminal law.

*The consumption of alcohol or drugs can be the cause of serious problems within the workplace. Staff who drink or take drugs are more likely to work inefficiently, be late to or absent from work, suffer from impaired concentration, coordination, judgment or decision making, have work-related accidents and endanger their colleagues and members of the public.*

*In addition, the use of alcohol or drugs by staff increases the likelihood of acts of misconduct or criminal behaviour that may have an adverse effect on the morale of other members of staff or relationships with co-workers or damage our reputation and/or business.*

*Taking even small amounts of alcohol or drugs before or whilst working will affect work performance, and there could be serious health and safety consequences. Staff driving to work after a night's heavy drinking may have blood alcohol levels in excess of the legal limit and may be unfit to drive or perform their duties and may pose a risk to the health and safety of others.*

*We have an overriding duty to protect the health, safety and welfare of all members of staff and any visitors to the workplace and anyone who may be affected by our activities.*

*This policy aims to deal with alcohol or drug use (whether continuous or irregular and including the proper and lawful use of over-the-counter medicine and prescribed medication) by individual members of staff which affects their conduct, attendance, performance or productivity.*

### **Prescribed medication**

*Use of prescribed or over-the-counter medicines (even when used correctly in accordance with instructions or advice) might have a detrimental effect on staff performance, conduct or the ability to undertake certain duties.*

*Staff taking prescribed or over-the-counter medicines should seek advice or information from their GP or a pharmacist regarding the possible side effects and whether they should avoid performing any of their duties, such as using machinery or driving*

*Where appropriate, staff should immediately inform their line manager of any possible side effects of their medication, and/or discuss any problems they may have with performing their duties. We reserve the right to require the member of staff to provide us with a medical report from their GP in circumstances where they have been told not to continue to undertake all or part of their duties.*

## **Providing advice and support**

*We recognise that, for a number of reasons, members of staff could develop alcohol or drug-related problems.*

*It is our intention to deal constructively and sympathetically with staff who have alcohol or drug-related problems, such as alcohol or drug dependency.*

*When it is known that a member of staff has an alcohol or drug problem, the primary objective of any discussions will be to assist them with the problem in as compassionate and constructive a way as possible.*

*If a member of staff admits to having alcohol or drug-related problems they should be encouraged by their line manager to seek treatment or rehabilitation. If the member of staff agrees to this, they should be informed of what support can be provided.*

*Depending on the circumstances, consideration should be given to:*

- 1. Referral to an occupational health therapist or other appropriate treatment provider in conjunction with their GP.*
- 2. Time off work to attend any recommended treatment by their GP or a medical/rehabilitation specialist and whether it should be treated as sick leave.*
- 3. Temporary re-allocation to other duties before, during and/or after rehabilitation.*
- 4. Suspension of any on-going disciplinary action in accordance with our disciplinary or capability procedures pending the outcome of the treatment or rehabilitation.*

*If after receiving help and support, the situation has not improved, the member of staff should be advised of the implications of any continuing problems with their performance, conduct or absence and should be given an indication of how the situation will be monitored and for how long.*

*Staff who unreasonably deny having alcohol or drug-related problems should be informed of the required improvements to their performance, behaviour or absence record (as appropriate), how the situation will be monitored and for how long.*

*If there is no improvement within the timescales given, the line manager must contact the head of Human resources, who may proceed to take action in accordance with our disciplinary or capability procedures.*

*If the member of staff refuses to seek help or discontinues a programme of treatment, this should not in itself provide grounds for disciplinary action. However, any unacceptable conduct, performance, absences or any conduct (whether due to actions or inactions by the member of staff) that poses a risk to the health and safety of other staff or members of the public, will be dealt with using our normal disciplinary or capability procedures.*

## **Confidentiality**

*Any discussions with a member of staff concerning their alcohol or drug-related problems and the record of any treatment or other action taken to resolve their problem will be treated as being strictly confidential, unless the member of staff agrees otherwise.*

*However, there may be times when we will need to disclose some confidential information in order to protect the health and safety of other staff or the general public. If we need to disclose any confidential information we shall take all reasonable steps to provide the member of staff with advance warning of this and to let him/her know what information will be disclosed, to whom and the reasons why.*

## **Prohibition of alcohol and drug consumption in the workplace**

*During working hours*

*All members of staff should be fit and capable of performing all their duties and responsibilities on arrival at work.*

*Staff must not:*

- 1. Bring alcohol or controlled substances onto, or consume alcohol or drugs on, our premises or our clients premises at any time.*

- 2. Drink alcohol or take drugs that may affect their ability to drive if they are required to drive in the course of performing their duties.*
- 3. Drink alcohol or take drugs that may affect their ability to carry out their duties during their working day, whilst on breaks or at lunchtime, without obtaining the prior authority of his/her line manager.*
- 4. Drink alcohol or take drugs that may affect their ability to carry out their duties whilst they are on operational standby or when undertaking on-call duties.*
- 5. Drink alcohol or take drugs that may affect their ability to carry out their duties at meetings, conferences, exhibitions or media or social events taking place during the working day whether on our premises or at another site without obtaining the prior authority of his/her line manager.*

#### *Representing the business after working hours*

*Staff representing us at business/client functions, conferences, exhibitions, or at media or social events outside normal working hours:*

- 1. Will be deemed to still be at work.*
- 2. May only drink moderately if drinking alcohol, and are expressly prohibited from possessing controlled substances or using drugs. that may affect their ability to carry out their duties*
- 3. Must ensure they are well within the legal limits if they are driving.*
- 4. Must ensure that they remain professional at all times and must not, by their conduct, actions or inactions, detrimentally affect our business or reputation.*

#### *After work*

*Staff activities after normal working hours and away from our premises are, of course, generally a personal matter and do not directly concern us.*

*Concern will arise if, because of the pattern or amount of drink or drugs involved, a staff member's attendance, work performance or conduct at work deteriorates or if their conduct damages the reputation of our business.*

#### **Disciplinary action**

*Disciplinary action will be taken in the following circumstances:*

- 1. If a member of staff is found to have breached any of the above mentioned restrictions regarding the consumption of alcohol or use of drugs.*
- 2. If misconduct takes place at work as a result of drinking alcohol or taking drugs.*
- 3. If a member of staff is found, in the reasonable opinion of his/her line manager, to be under the influence of alcohol or drugs whilst at work. This could, for example, include circumstances where the member of staff has not committed an act of misconduct but is incapable of properly performing all or some of their duties to our required standards.*
- 4. If a member of staff is believed to be buying or selling drugs on our premises.*
- 5. If a member of staff is found to be in possession of controlled substances on our premises.*
- 6. If the consumption of alcohol, use of drugs or possession of controlled substances by a member of staff damages the reputation of our business.*

*A breach of any of the above mentioned restrictions is a disciplinary offence and depending on the seriousness of the offence, it may amount to gross misconduct and could result in summary dismissal.*

*Any disciplinary action will be dealt with in accordance with our disciplinary procedures.*

*Staff found to be in possession of or selling controlled substances at work will be immediately reported to the Police.*

*We reserve the right to arrange for the member of staff to be escorted from our premises immediately, and sent home without pay for the rest of the day or shift if we believe that they have breached this policy.*

### **Alcohol and drug testing**

*We reserve the right to carry out random alcohol and drug screening tests on those members of staff whose activities and job duties may have a significant impact on the health and safety of our workforce, our clients work force or members of the public*

*If a member of staff receives a positive test result this will be viewed as a gross misconduct offence, and potentially render them liable to summary dismissal in accordance with our disciplinary procedures.*

*Unreasonable refusal to submit to an alcohol or drug screening test will also be dealt with through our disciplinary procedures.*

### **Searches**

*We reserve the right to search our premises for evidence of any breach of this policy, which includes, without limitation, staff lockers, cabinets, desks.*



*Signed*

*Ian McDonald – Managing Director*

*Date: 04/2018*

*Next Review Date: 04/2019*

***GEO Pollution Technologies (UK) Ltd***



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## FAIR TRADE POLICY & PROCEDURE

### 1.0 Scope and Purpose

- *This policy and procedure is applicable to all **Geo Pollution Technologies** and Suppliers to **Geo Pollution Technologies***
- *This policy and procedure must be followed by any **Geo Pollution Technologies** staff procuring or consuming goods or services either on our site or working off-site in the service of **Geo Pollution Technologies**.*

### 2.0 Key Responsibilities

- *Sales, Marketing & Admin have a responsibility for overseeing the implementation and monitoring of this policy.*
- *Admin has a key role in ensuring Fair Trade and sustainability feature as part of the evaluation of supplier tenders.*
- *Support from the top of the organization downwards is imperative as Fairtrade goods may not always be the cheapest on offer.*

### 3.0 Policy

#### 3.1 Education

*It is recognised by the company that there is an important educational as well as an ethical justification for supporting and promoting Fair Trade. This aligns with our commitment to sustainable development and education for sustainable development. Recognising the fact that we advocate a global perspective and sustainability within the curriculum, it is important that the company supports sustainable development when it conducts its business.*

#### 3.2 Sale of Fairtrade Products

*The current business activities undertaken by **Geo Pollution Technologies** do not utilise fairly traded products; however, if business activities are to change, it is **Geo Pollution Technologies** aim to ensure products sold are from fairly traded sources.*

#### 3.3 Procurement

*Hospitality:*

*The company will always try serve Fair Trade beverages (e.g. tea and coffee, including sugar) at all internal meetings and hospitality events (e.g. open days), with a commitment to increasing the use of Fair Trade products as it becomes possible to do so.*

Signed

Ian McDonald – Managing Director

Date: **04/2018**

Next Review Date: **04/2019**

**GEO Pollution Technologies (UK) Ltd**



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## **HAND ARM VIBRATION (HAVS) POLICY & PROCEDURE**

*At Geo Pollution Technologies (UK) Ltd, we recognise that Hand Arm Vibration and associated work related upper limb disorders can be caused by the use of vibrating and rotary power tools.*

*To clarify:-*

*The company has a strategy to manage and monitor the use of the equipment that has been identified to cause the condition.*

*All company power tools that have been identified as required to carry out the work tasks have been assessed.*

*A matrix has been produced and issued to the safety file of all vans in addition to being available to all staff in the office.*

*All staff that hire equipment are required to request the (HAVS) information of the tool at the point of hire, the person in charge of the work must include the information in the Risk Assessment and inform the staff of the findings.*

*It is the responsibility of the management to ensure that all tasks that involve the use of power tools are suitably assessed and exposure reduced to a minimum at the planning stage.*

*Critical worker Occupational screening will include a Level 1&2 Initial HAVS assessment; any reported symptoms will be referred for a level 3 assessment.*

*The company has a programme in place to continually assess work methods and reduce the exposure to employees.*

*Signed*

*Ian McDonald – Managing Director*

*Date: 04/2018*

*Next Review Date: 04/2019*

**GEO Pollution Technologies (UK) Ltd**



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## **Internet Privacy Policy**

*Geo Pollution Technologies (UK) Ltd operates [www.GPTenvironmental.co.uk](http://www.GPTenvironmental.co.uk) This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site.*

*We use your Personal Information only for monitoring and improving the Site. By using the Site, you agree to the collection and use of information in accordance with this policy.*

### **Log Data**

*Like many site operators, we collect anonymous information that your browser sends whenever you visit our Site ("Log Data").*

*This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.*

*In addition, we use the third party service Google Analytics to collect, monitor and analyse the data in order to improve the effectiveness of our website.*

### **Communications**

*Should you contact us via the "email us" form we will use your personal information to contact you in regards to your query. Additionally, if you opt in on that form with the checkbox provided we may contact you with newsletters, marketing or promotional materials.*

### **Cookies**

*Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent.*

### **Security**

*The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.*

### **Contact Us**

*If you have any questions about this Privacy Policy, please contact us.*

Signed 

..... Date: **05/2017**

Sam Chick – Marketing Manager

Next Review Date: **05/2018**

**GEO Pollution Technologies (UK) Ltd**



## **SOCIAL MEDIA POLICY**

### **1.0 BACKGROUND**

*The **Geo Pollution Technologies** Social Media Policy is intended to provide all directors and employees (collectively, “Employees”) of **Geo Pollution Technologies** with a basic policy on their use of social media. Social media is a valuable, easy-to-use service and tool. However, using it in the wrong way not only may damage consumer confidence in **Geo Pollution Technologies** and the **Geo Pollution Technologies** brand image, but could even lower confidence so far as to endanger **Geo Pollution Technologies** existence as a company.*

*For the purpose of compliance, **Geo Pollution Technologies** has established the **Geo Pollution Technologies** Code of Conduct prescribing our basic concept for fulfilling corporate social responsibility, and based upon the **Geo Pollution Technologies** Code of Conduct, the **Geo Pollution Technologies** General Principles prescribing our guidelines for corporate and employee actions. The Social Media Policy is based on the Code of Conduct and the **Geo Pollution Technologies** General Principles and sets out important considerations for Employees of **Geo Pollution Technologies** in their use of social media.*

### **2.0 SOCIAL MEDIA POLICY**

#### **2.1 SCOPE**

*Every Employee of **Geo Pollution Technologies**, regardless of his/her organisational unit or form of employment, will comply with all of the followings.*

#### **2.2 To realize that what is said as a private person may be understood as spoken on behalf of **Geo Pollution Technologies**.**

- *To remember that he/she is an Employee of **Geo Pollution Technologies** and take care not to mislead his/her readers into thinking that he/she is speaking on behalf of **Geo Pollution Technologies**, whether or not he/she mentions to of **Geo Pollution Technologies** in the post.*
- *To avoid stating his/her personal opinions or views in a way that may be interpreted as a public statement made on behalf of **Geo Pollution Technologies**.*

#### **2.3 Compliance with applicable laws and regulations and **Geo Pollution Technologies** regulations.**

To comply with laws and regulations, and **Geo Pollution Technologies** regulations, and not to infringe any intellectual property right or other right of others

2.4 To be honest and responsible.

- To be responsible for what he/she has posted.
- To realize that his/her post may be seen by an unspecified large number of people and respect those readers may make their own individual interpretations on his/her post.
- To be aware that highly emotional communication is very likely to prolong useless argument, increase misunderstanding and make the situation worse.
- To respect the rights of the person he/she is posting about and the opinions of his/her readers.
- Not to post anything that offends accepted social standards of decency • Not to post anything that offends accepted social standards of decency.

2.5 To respect the confidentiality of certain information.

- Not to post any personal or confidential business information about **Geo Pollution Technologies** or **Geo Pollution Technologies** stakeholders.
- Not to post any information that is not publicly available and is learned in the course of his/her jobs.

2.6 To realize that information once posted online cannot be deleted

- To make a post upon the understanding that Information once posted online may be unable to completely delete and may be publicly available for a long time.

2.7 To realize how fast information spreads online

To make a post upon the understanding that it is quite easy to copy and cite the information posted online and it may fast spread to other media

**3.0 To our customers and other users of social media sites**

3.2 Posting by other customers.

Please be aware that any post made by any Employee of **Geo Pollution Technologies** at other than the **Geo Pollution Technologies** customer account is not necessarily a public statement or view of **Geo Pollution Technologies**.

Signed



Ian McDonald – Managing Director

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**



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## **Sustainable Procurement Policy**

*It is the stated policy of Geo Pollution Technologies to reduce its environmental impact where practicable.*

*Sustainable Procurement form an integral part of the overall Company strategy, helping to improve both operational performance and a reduction in potentially harmful emissions to land, water and air, while supporting local businesses.*

### ***To help achieve this, the company will;***

- *Promote the use of local businesses for the purchasing of goods where practical, ideally sourcing goods within a 10mile radius of a job site.*
- *Aim to always source wood products from Forest Stewardship Council (FSC) accredited sources.*
- *Promote good logistical planning for the delivery of goods and services.*
- *Aim to purchase Fairly Traded goods in line with the Fair Trade Policy.*
- *Set up a file of approved suppliers who have been rigorously checked for Environmental, Health and Safety and Quality standards.*

*This Sustainable Procurement policy statement underpins the existing Environmental, Carbon Footprint and Fair Trade policy.*

Signed

Ian McDonald – Managing Director

Date: **04/2018**

Next Review Date: **04/2019**

**GEO Pollution Technologies (UK) Ltd**



## **Tax Evasion Code of Conduct Policy Statement**

### **Summary**

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*This code of conduct summarises the procedures of Geo Pollution Technologies (UK) Ltd and its subsidiaries to ensure all Geo Pollution Technologies (UK) Ltd associated persons, including employees and those acting on our behalf, do not facilitate tax evasion.*

### **Statement**

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*Tax evasion, tax fraud and attempts to facilitate such actions are antithetical to the ethos of Geo Pollution Technologies (UK) Ltd. Such actions reduce the amount of revenue the government needs to create the conditions for our business to flourish. It amounts to little more than stealing from our customers and from ourselves. Geo Pollution Technologies (UK) Ltd is committed to no tolerance for tax evasion, and we are committed to a dedicated programme to counter the risk of any employee, contractor, business partner or representative of our company engaging in the criminal facilitation of tax evasion.*

*We expect everyone who works with our company to fully comply with their tax obligations. We will not tolerate, permit or allow any person associated with us to engage in the facilitation of tax evasion or tax fraud by any of our customers, suppliers, business partners, contractors or employees anywhere in the world.*

*Geo Pollution Technologies (UK) Ltd is committed to complying in full with the tax laws everywhere we operate, and we choose to do this by respecting not only the letter of the law, but the spirit of the underlying tax policy intent. We aim to pay the right amount of tax at the right time, on all the eligible profits we make.*

### **Accountability & Governance**

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*Top management, consisting of directors and senior management have approved this policy and our commitment to no tolerance of tax evasion or its facilitation. This director is responsible for monitoring compliance with this policy and is supported by his senior manager.*

## **Employee responsibilities**

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*Our code of conduct sets the standards of behaviour we expect all employees to adhere to. Our employees have a responsibility to take reasonable action to prevent harm to Geo Pollution Technologies (UK) Ltd and we hold our employees accountable for their actions and omissions. Any actions that breach the Criminal Finances Act and the tax laws of wherever we operate brings harm to Geo Pollution Technologies (UK) Ltd and will not be tolerated.*

*You are responsible for properly following Geo Pollution Technologies (UK) Ltd policies and procedures. These should generally ensure that all taxes are properly paid. If you are ever asked by anyone either inside or outside our company to go outside our standard procedures, this should be reported without delay, as someone may be attempting to evade tax.*

*Any employee who has any concerns relating to any potential breach of this policy must immediately follow our whistleblowing policy and report the matter without delay.*

## **Our assessment**

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*Our assessment covers the categories of business operations we are involved in where there is a risk of tax evasion.*

### ***High risk areas for our business include:***

- *Accounts payable*
- *Accounts receivable*
- *Payment to contractors*

### ***The key factors which may increase risk include:***

- *Cash transactions*
- *Transactions in certain regions of the world.*

### ***Accounts Payable***

- *Only contract with businesses which have good reputations.*
- *Ensure all information on an invoice is correct and as expected.*
- *Have the full contact details of the supplier and ensure it matches to where the payment is being made.*
- *Specify in contacts that VAT and other sales taxes must be added to invoices and have written reasons why such added taxes are not required.*

- *Do not pay suppliers in cash. If cash payments must be made, ensure they are properly invoiced and a receipt is supplied.*

### **Accounts Receivable**

- *Ensure correct procedures are followed.*
- *Do not process off-system invoices.*
- *Ensure all invoices have the correct VAT coding.*

### **Contractors**

- *Any wage payments outside of payroll must be expressly approved.*
- *Where tax is required to be deducted at the source this must be done.*
- *Payments to contractors should only be made in strict accordance with company policies.*
- *Cash payments should not be made. If they are, invoices and receipts must be present.*
- *Any tax related withholdings must be deducted and recorded.*
- *Payments without deductions should only be made if there is a reasonable expectation that the recipient will meet their tax obligations.*

### **Our commitment**

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*Geo Pollution Technologies (UK) Ltd is committed to the following principles:*

- *Our business is carried out fairly, honestly, and openly in every part of our work.*
- *Our values inform everything we do.*
- *We will never sell any product or service where we know or suspect that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.*
- *We will never buy any product or service from any supplier where it is known or suspected that any aspect of the transaction is being misused, abused or otherwise corrupted for the purposes of tax evasion.*
- *We will immediately terminate any agreement or business relationship as soon as our company learns of or suspects tax evasion may be taking place.*
- *We will not progress any business opportunity where there is any suspicion that any aspect of it may involve tax evasion.*

- *We will not do business with others who do not also hold to at least the same standard of preventing tax evasion.*
- *Our company will regularly monitor and review this policy.*
- *Any employee found in breach of this policy will be subject to disciplinary action.*
- *We will not tolerate any contractor, business partner, representative or other third party associated with us failing to uphold this policy.*
- *No employee will suffer demotion, penalty, or any other adverse action for reporting any breach of this policy or from refusing to carry out an action which may lead to a breach of this policy.*

Signed   
Ian McDonald Managing Director

Date: **01/2018**  
Next Review Date: **04/2018**



**Environmental  
Management  
Services**

## **Welsh Language Policy 2018**

*At Geo Pollution Technologies we are committed to the fact that the Welsh language has official status, and should be treated no less favourably than the English language.*

*Geo Pollution Technologies understand that it makes good business sense to provide services in the language of choice of our customers. At Geo Pollution Technologies we also consider it to be respectful to our employees to encourage and facilitate the use of their chosen language.*

*At Geo Pollution Technologies we try and make progress towards achieving this ambition, and this Policy outlines our current commitments in relation to using Welsh while where appropriate, sets targets to help us develop the use of Welsh.*

*Geo Pollution Technologies commitments to this policy should be construed practically, and understood they are restricted to activities and services in Wales, for Welsh people, within our influence and control.*

### **Corporate Identity**

*Our corporate brand is in English only.*

### **Advertising and Marketing**

*Generally, our advertising is in English only. Our recruitment advertising is in English only, although Welsh language translations are available.*

### **Correspondence**

*At the moment, we generally communicate to people in English (Both written and verbal). We recognise our clients' choice to correspond with us in Welsh and we will endeavour to respond in their preferred language.*

### **Awareness**

*This policy will be available to the public and staff alike.*

### **Leadership**

*We will ensure that this policy is supported by the managing director.*

Signed

*Ian McDonald – Managing Director*

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**



## WHISTLEBLOWER PROTECTION POLICY

*Geo Pollution Technologies (UK) Ltd requires directors, managers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Geo Pollution Technologies, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.*

*This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Geo Pollution Technologies can address and correct inappropriate conduct and actions. It is the responsibility of all directors, managers, and employees to report concerns about violations of Geo Pollution Technologies code of ethics or suspected violations of law or regulations that govern Geo Pollution Technologies operations.*

*It is contrary to the values of Geo Pollution Technologies for anyone to retaliate against any directors, managers or employee who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Geo Pollution Technologies. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.*

*Geo Pollution Technologies has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the General Manager, or a Director. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to Geo Pollution Technologies General Manager, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Managing Director.*

*Geo Pollution Technologies General Manager is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The General Manager will advise the Managing Director of all complaints and their resolution and will report at least annually on compliance activity relating to accounting or alleged financial improprieties to the*

*Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.*

*Geo Pollution Technologies Manager will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.*

Signed

A handwritten signature in blue ink, appearing to read 'Ian McDonald'.

Ian McDonald – Managing Director

Date: 04/2018

Next Review Date: 04/2019

**GEO Pollution Technologies (UK) Ltd**



Geo Pollution Technologies (UK) Ltd  
Data Protection Policy  
May 2018

## 1. Introduction

This Policy sets out the obligations of Geo Pollution Technologies (UK) Ltd, a company registered in the United Kingdom under number 4689357, whose registered office is at 4 Village Court, Village Farm Industrial Estate, Pyle, Bridgend CF33 6BX (“the Company”) regarding data protection and the rights of Employees, Clients & Customers (“data subjects”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “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.

This Policy sets the Company’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

## 2. The Data Protection Principles

This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

- 2.1 Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- 2.2 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.
- 2.3 Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- 2.4 Accurate and, where necessary, kept up to date. Every reasonable step must

be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.

- 2.5 Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is 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 the data subject.
- 2.6 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.

### 3. **The Rights of Data Subjects**

The GDPR sets out the following rights applicable to data subjects (please refer to the parts of this policy indicated for further details):

- 3.1 The right to be informed (Part 12).
- 3.2 The right of access (Part 13);
- 3.3 The right to rectification (Part 14);
- 3.4 The right to erasure (also known as the 'right to be forgotten') (Part 15);
- 3.5 The right to restrict processing (Part 16);
- 3.6 The right to data portability (Part 17);
- 3.7 The right to object (Part 18); and
- 3.8 Rights with respect to automated decision-making and profiling (Parts 19 and 20).

### 4. **Lawful, Fair, and Transparent Data Processing**

- 4.1 The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:
  - 4.1.1 The data subject has given consent to the processing of their personal data for one or more specific purposes;
  - 4.1.2 The processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract with them;
  - 4.1.3 The processing is necessary for compliance with a legal obligation to which the data controller is subject;
  - 4.1.4 The processing is necessary to protect the vital interests of the data subject or of another natural person;
  - 4.1.5 The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or

- 4.1.6 The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
- 4.2 [If the personal data in question is “special category data” (also known as “sensitive personal data”) (for example, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), at least one of the following conditions must be met:
  - 4.2.1 The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so);
  - 4.2.2 The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law (insofar as it is authorised by EU or EU Member State law or a collective agreement pursuant to EU Member State law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);
  - 4.2.3 The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
  - 4.2.4 The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;
  - 4.2.5 The processing relates to personal data which is clearly made public by the data subject;
  - 4.2.6 The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;
  - 4.2.7 The processing is necessary for substantial public interest reasons, on the basis of EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;
  - 4.2.8 The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;
  - 4.2.9 The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis

of EU or EU Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or

4.2.10 The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.]

## 5. **Specified, Explicit, and Legitimate Purposes**

5.1 The Company collects and processes the personal data set out in Part 21 of this Policy. This includes:

5.1.1 Personal data collected directly from data subjects.

5.1.2 Personal data obtained from third parties (if applicable).

5.2 The Company only collects, processes, and holds personal data for the specific purposes set out in Part 21 of this Policy (or for other purposes expressly permitted by the GDPR).

5.3 Data subjects are kept informed at all times of the purpose or purposes for which the Company uses their personal data. Please refer to Part 12 for more information on keeping data subjects informed.

## 6. **Adequate, Relevant, and Limited Data Processing**

The Company will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed) as under Part 5, above, and as set out in Part 21, below.

## 7. **Accuracy of Data and Keeping Data Up-to-Date**

7.1 The Company shall ensure that all personal data collected, processed, and held by it is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 14, below.

7.2 The accuracy of personal data shall be checked when it is collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

## 8. **Data Retention**

8.1 The Company shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.

8.2 When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

- 8.3 For full details of the Company's approach to data retention, including retention periods for specific personal data types held by the Company, please refer to our Data Retention Policy.

## 9. **Secure Processing**

The Company shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in Parts 22 to 27 of this Policy.

## 10. **Accountability and Record-Keeping**

- 10.1 The Company's Data Protection Officer is dependent on the personal data stream in question; refer to Data Audit Table for relevant Data Protection Officer/Manager.
- 10.2 The Data Protection Officer/Manager shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other data protection-related policies, and with the GDPR and other applicable data protection legislation.
- 10.3 The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
- 10.3.1 The name and details of the Company, its Data Protection Officer, and any applicable third-party data processors;
  - 10.3.2 The purposes for which the Company collects, holds, and processes personal data;
  - 10.3.3 Details of the categories of personal data collected, held, and processed by the Company, and the categories of data subject to which that personal data relates;
  - 10.3.4 Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
  - 10.3.5 Details of how long personal data will be retained by the Company (please refer to the Company's Data Retention Policy); and
  - 10.3.6 Detailed descriptions of all technical and organisational measures taken by the Company to ensure the security of personal data.

## 11. **Data Protection Impact Assessments**

- 11.1 The Company shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data which may involve the use of new technologies and the processing involved is likely to result in a high risk to the rights and freedoms of data subjects under the GDPR.
- 11.2 Data Protection Impact Assessments shall be overseen by the Data Protection Officer/Manager relevant to the personal data being recorded/processed and shall address the following:
- 11.2.1 The type(s) of personal data that will be collected, held, and processed;

- 11.2.2 The purpose(s) for which personal data is to be used;
- 11.2.3 The Company's objectives;
- 11.2.4 How personal data is to be used;
- 11.2.5 The parties (internal and/or external) who are to be consulted;
- 11.2.6 The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
- 11.2.7 Risks posed to data subjects;
- 11.2.8 Risks posed both within and to the Company; and
- 11.2.9 Proposed measures to minimise and handle identified risks.

## 12. **Keeping Data Subjects Informed**

- 12.1 The Company shall provide the information set out in Part 12.2 to every data subject:
  - 12.1.1 Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and
  - 12.1.2 Where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:
    - a) if the personal data is used to communicate with the data subject, when the first communication is made; or
    - b) if the personal data is to be transferred to another party, before that transfer is made; or
    - c) as soon as reasonably possible and in any event not more than one month after the personal data is obtained.
- 12.2 The following information shall be provided:
  - 12.2.1 Details of the Company including, but not limited to, the identity of its Data Protection Officer/Relevant Manager;
  - 12.2.2 The purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 21 of this Policy) and the legal basis justifying that collection and processing;
  - 12.2.3 Where applicable, the legitimate interests upon which the Company is justifying its collection and processing of the personal data;
  - 12.2.4 Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
  - 12.2.5 Where the personal data is to be transferred to one or more third parties, details of those parties;
  - 12.2.6 Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the "EEA"), details of that transfer, including but not limited to the safeguards in place (see Part 28 of this Policy for further details);
  - 12.2.7 Details of data retention;
  - 12.2.8 Details of the data subject's rights under the GDPR;

- 12.2.9 Details of the data subject's right to withdraw their consent to the Company's processing of their personal data at any time;
- 12.2.10 Details of the data subject's right to complain to the Information Commissioner's Office (the "supervisory authority" under the GDPR);
- 12.2.11 Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it; and
- 12.2.12 Details of any automated decision-making or profiling that will take place using the personal data, including information on how decisions will be made, the significance of those decisions, and any consequences.

### 13. **Data Subject Access**

- 13.1 Data subjects may make subject access requests ("SARs") at any time to find out more about the personal data which the Company holds about them, what it is doing with that personal data, and why.
- 13.2 Data subjects wishing to make a SAR may do so in writing, using the Company's Subject Access Request Form (if applicable), or through written communication. SARs should be addressed to the Company's Data Protection Officer/Relevant Data Manager at 4 Village Court, Village Farm Industrial Estate, Pyle, Bridgend CF33 6BX.
- 13.3 Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.
- 13.4 All SARs received shall be handled by the Company's Data Protection Officer/Relevant Manager.
- 13.5 The Company does not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

### 14. **Rectification of Personal Data**

- 14.1 Data subjects have the right to require the Company to rectify any of their personal data that is inaccurate or incomplete.
- 14.2 The Company shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Company of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.
- 14.3 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

## 15. Erasure of Personal Data

- 15.1 Data subjects have the right to request that the Company erases the personal data it holds about them in the following circumstances:
  - 15.1.1 It is no longer necessary for the Company to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;
  - 15.1.2 The data subject wishes to withdraw their consent to the Company holding and processing their personal data;
  - 15.1.3 The data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so) (see Part 18 of this Policy for further details concerning the right to object);
  - 15.1.4 The personal data has been processed unlawfully;
  - 15.1.5 The personal data needs to be erased in order for the Company to comply with a particular legal obligation;
  - 15.1.6 The personal data is being held and processed for the purpose of providing information society services to a child
- 15.2 Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.
- 15.3 In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

## 16. Restriction of Personal Data Processing

- 16.1 Data subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.
- 16.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

## 17. Data Portability

- 17.1 The Company processes personal data using various techniques, electronic devices and automated means. Automated processes include: Payroll, HMRC data processing and applications via CV (recruitment consultancy).
- 17.2 Where data subjects have given their consent to the Company to process their personal data in such a manner, or the processing is otherwise required for the performance of a contract between the Company and the data subject, data subjects have the right, under the GDPR, to receive a copy of their

personal data and to use it for other purposes (namely transmitting it to other data controllers).

17.3 To facilitate the right of data portability, the Company shall make available all applicable personal data to data subjects in the following format:

17.3.1 CSV (Comma Separated Values)

17.4 Where technically feasible, if requested by a data subject, personal data shall be sent directly to the required data controller.

17.5 All requests for copies of personal data shall be complied with within one month of the data subject's request. The period can be extended by up to two months in the case of complex or numerous requests. If such additional time is required, the data subject shall be informed.

## 18. **Objections to Personal Data Processing**

18.1 Data subjects have the right to object to the Company processing their personal data based on legitimate interests, direct marketing (including profiling), and processing for scientific and/or historical research and statistics purposes.

18.2 Where a data subject objects to the Company processing their personal data based on its legitimate interests, the Company shall cease such processing immediately, unless it can be demonstrated that the Company's legitimate grounds for such processing override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

18.3 Where a data subject objects to the Company processing their personal data for direct marketing purposes, the Company shall cease such processing immediately.

18.4 Where a data subject objects to the Company processing their personal data for scientific and/or historical research and statistics purposes, the data subject must, under the GDPR, "demonstrate grounds relating to his or her particular situation". The Company is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

## 19. **Automated Decision-Making**

19.1 The Company does not use personal data in automated decision-making processes. If data is to be used in automated decision-making processes this will be reviewed by the company during review of the data audit. Data may be collected automatically, e.g. clocking-in technology and vehicle tracking; however, no automated decisions are based on this as processed data is managed by Human Resources/Relevant Manager.

19.2 Where such decisions have a legal (or similarly significant effect) on data subjects, those data subjects have the right to challenge to such decisions under the GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from the Company.

19.3 The right described in Part 19.2 does not apply in the following circumstances:

19.3.1 The decision is necessary for the entry into, or performance of, a contract between the Company and the data subject;

19.3.2 The decision is authorised by law; or

19.3.3 The data subject has given their explicit consent.

## 20. Profiling

- 20.1 The Company uses personal data for profiling purposes. Vehicle Telematics automatically records location, speed and direction of driver. This data is pseudonymised, but can be linked to personal data.
- 20.2 When personal data is used for profiling purposes, the following shall apply:
- 20.2.1 Clear information explaining the profiling shall be provided to data subjects, including the significance and likely consequences of the profiling;
- 20.2.2 Appropriate mathematical or statistical procedures shall be used, if applicable;
- 20.2.3 Technical and organisational measures shall be implemented to minimise the risk of errors. If errors occur, such measures must enable them to be easily corrected; and
- 20.2.4 All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling (see Parts 22 to 26 of this Policy for more details on data security).

## 21. Personal Data Collected, Held, and Processed

The following personal data is collected, held, and processed by the Company (for details of data retention, please refer to the Company's Data Retention Policy). Further information can be obtained by referring to the Data Audit Table:

<b>Data Ref.</b>	<b>Type of Data</b>	<b>Purpose of Data</b>
Employee	Personal Data	Contractual Necessity
Employee	Personal Data	Compliance with Legal Obligations
Medical	Sensitive Data	Compliance with Legal Obligations
Client Data	Personal Data	Legitimate Interests & Contractual Necessity
Employee	Pseudonymised Data	Telematics – Contractual Necessity
Customer Satisfaction	Personal Data	Contractual Necessity
Pre-Qualification Data	Personal Data	Contractual Necessity & Compliance with Legal Obligations
Brochure / Case Studies	Personal Data	Contractual – Model Release Form
Marketing	Personal Data	Consent
Applicants	Personal Data	Legitimate Interests

## **22. Data Security - Transferring Personal Data and Communications**

The Company shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

- 22.1 All emails containing personal data must be encrypted using End to End encryption if available, if encryption cannot be guaranteed an alternative service will be utilised to transfer personal data;
- 22.2 All emails containing personal data must be marked "confidential";
- 22.3 Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- 22.4 Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- 22.5 Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be securely deleted;
- 22.6 Where personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;
- 22.7 Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using approved data transfer service that can guarantee the transfer of the personal data
- 22.8 All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked "confidential".

## **23. Data Security - Storage**

The Company shall ensure that the following measures are taken with respect to the storage of personal data:

- 23.1 All electronic copies of personal data should be stored securely using passwords and approved methods of data encryption;
- 23.2 All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;
- 23.3 All personal data stored electronically should be backed up twice daily with a daily copy stored on the cloud. All backups should be encrypted using approved and accredited encryption programmes (AES 256 bit);
- 23.4 No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise without the formal written approval of Company Director: Ian McDonald and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary; and
- 23.5 No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to the

Company that all suitable technical and organisational measures have been taken).

#### **24. Data Security - Disposal**

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please refer to the Company's Data Retention Policy.

#### **25. Data Security - Use of Personal Data**

The Company shall ensure that the following measures are taken with respect to the use of personal data:

- 25.1 No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested from Company Director: Ian McDonald or Accountant: Christine Goldup;
- 25.2 No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of Company Director: Ian McDonald or Accountant: Christine Goldup;
- 25.3 Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors, or other parties at any time;
- 25.4 If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it; and
- 25.5 Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of Marketing Manager to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

#### **26. Data Security - IT Security**

The Company shall ensure that the following measures are taken with respect to IT and information security:

- 26.1 All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols. All software used by the Company is designed to require such passwords.;
- 26.2 Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- 26.3 All software (including, but not limited to, applications and operating systems) shall be kept up-to-date. The Company's IT staff shall be responsible for

installing any and all security-related updates as soon as reasonably and practically possible, unless there are valid technical reasons not to do so; and

- 26.4 No software may be installed on any Company-owned computer or device without the prior approval of the Company Director: Ian McDonald or Office Manager: Shirley Berry and approved by IT Consultancy.

## 27. **Organisational Measures**

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- 27.1 All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the GDPR and under this Policy, and shall be provided with a copy of this Policy;
- 27.2 Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;
- 27.3 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- 27.4 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised;
- 27.5 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;
- 27.6 Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
- 27.7 All personal data held by the Company shall be reviewed periodically, as set out in the Company's Data Retention Policy;
- 27.8 The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- 27.9 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the GDPR and this Policy by contract;
- 27.10 All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the GDPR; and
- 27.11 Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

## 28. **Transferring Personal Data to a Country Outside the EEA**

- 28.1 The Company may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.
- 28.2 The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:
- 28.2.1 The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;
- 28.2.2 The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the GDPR); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;
- 28.2.3 The transfer is made with the informed consent of the relevant data subject(s);
- 28.2.4 The transfer is necessary for the performance of a contract between the data subject and the Company (or for pre-contractual steps taken at the request of the data subject);
- 28.2.5 The transfer is necessary for important public interest reasons;
- 28.2.6 The transfer is necessary for the conduct of legal claims;
- 28.2.7 The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or
- 28.2.8 The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

## 29. **Data Breach Notification**

- 29.1 All personal data breaches must be reported immediately to the Company's Personal Data Manager, Compliance Manager AND Relevant Manager for the personal data in question AND IT Consultant.
- 29.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer/Relevant Manager must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, **within 72 hours after having become aware of it.**
- 29.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 29.2) to the rights and freedoms of

data subjects, the Relevant Manager for that particular personal data must ensure that all affected data subjects are informed of the breach directly and without undue delay.

29.4 Data breach notifications shall include the following information:

29.4.1 The categories and approximate number of data subjects concerned;

29.4.2 The categories and approximate number of personal data records concerned;

29.4.3 The name and contact details of the Company's data protection/Relevant Manager for that particular personal data (or other contact point where more information can be obtained);

29.4.4 The likely consequences of the breach;

29.4.5 Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

### 30. **Implementation of Policy**

This Policy shall be deemed effective as of 25<sup>th</sup> May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

<b>Name:</b>	Ian McDonald
<b>Position:</b>	Managing Director
<b>Date:</b>	14.05.2018
<b>Due for Review by:</b>	13.05.2019

**Signature:**

