

# PRIVACY NOTICE (TIER 4)

## Document Control

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## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2. Responsibilities

- 2.1 Where the client uses [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) which is delivered by Charlton Ross Designs Ltd for the management of health and safety and fire safety related data their Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to them entering the personal data into [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk)
- 2.2 All client staff who use [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) and interact with data subjects are responsible for ensuring that this notice is drawn to data subjects attention and their consent to the processing of their data is secured in line with their own GDPR policies and procedures.

## 3. Privacy notice

### 3.1 Who are we?

[www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) is a risk management service delivered by Charlton Ross Designs Ltd, provided to clients to enable them to collate, organise and interactive with data related to the management of health and safety in line with UK legislation, including the Health and Safety at Work Etc Act 1974, associated Regulations and the Regulatory Reform (Fire Safety) Order 2005.

Our Data Protection Officer (DPO) – Ian Griffiths can be contacted directly here:

- [support@riskpriorityindex.co.uk](mailto:support@riskpriorityindex.co.uk)
- 020 8339 1285

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The personal data we would like to process on you is:

<b>Personal data type:</b>	<b>Source</b> (where the client has stored the personal data within <a href="http://www.riskpriorityindex.co.uk">www.riskpriorityindex.co.uk</a> it has not been collected directly from you, the data subject.
Full Name	As provided by the Client (Service User) of <a href="http://www.riskpriorityindex.co.uk">www.riskpriorityindex.co.uk</a>
Email Address	As provided by the Client (Service User) of <a href="http://www.riskpriorityindex.co.uk">www.riskpriorityindex.co.uk</a>
Position Held with Your Employer	As provided by the Client (Service User) of <a href="http://www.riskpriorityindex.co.uk">www.riskpriorityindex.co.uk</a>

The personal data provided to [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) will be used for the following purposes:

- Establishing a unique identity within [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk), to enable individuals to securely access and interact with the [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) service
- Establishing a unique identity within [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) to enable the service to record actions taken by individuals.

Our legal basis for processing for the personal data:

- To enable the client to have a fully auditable data trail in relation to the management of health and safety and fire safety in line with their legal obligations.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- As a service provider, the identity details held are for the purposes of establishing accessibility and auditability as set out above

The special categories of personal data concerned are:

- Aside from personal data previously identified, we do not hold any other personal data deemed within the special categories under the regulations

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### 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by:

- Making a request to your organisation's System Administrator of [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk)
- By emailing [support@riskpriorityindex.co.uk](mailto:support@riskpriorityindex.co.uk) with your request to withdraw consent, the System Administrator of the Client for which your personal data is held against, will be advised of your request to withdraw consent.

### 3.3 Disclosure

[www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) will not pass on your personal data to third parties.

### 3.4 Retention period

[www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) will process personal data for the duration of the client's service provision as per their terms of service and will store the personal data for the client's service provision as per their terms of service.

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.

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- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

## 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by riskpriorityindex.co.uk, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and www.riskpriorityindex.co.uk's data protection Officer Ian Griffiths.

The details for each of these contacts are:

	<b>Supervisory Authority Contact details</b>	<b>Data Protection Officer (DPO) contact details</b>
Contact Name:	Information Commissioner's Office	Ian Griffiths
Address line 1:	Wycliffe House	80 Manor Road North
Address line 2:	Water Lane	Hinchley Wood
Address line 3:	Wilmslow	Esher
Address line 4:	SK9 5AF	KT10 0AD
Email:	<a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>	<a href="mailto:support@riskpriorityindex.co.uk">support@riskpriorityindex.co.uk</a>
Telephone:	0303 123 1113	020 8339 1285

## 3.7 Privacy statement

Read more about how and why we use your data here  
<http://www.riskpriorityindex.co.uk/privacystatement.pdf>

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## 4. Online privacy statement

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

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

### How we use your information

This privacy notice tells you how we, [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk), will collect and use your personal data for the purposes of interaction with the online service.

### Why does [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) need to collect and store personal data?

In order for us to provide you a Risk Management Service we need to collect personal data to enable you to have a secure and identifiable access to the service, and to provide traceability for the information that you record. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) would contact you for additional consent if required.

### Will [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) share my personal data with anyone else?

We do not pass your personal data on to any third-party service providers. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

### How will [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) use the personal data it collects about me?

[www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

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### Under what circumstances will [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

### Can I find out the personal data that the organisation holds about me?

[www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) at your request, can confirm what information we hold about you and how it is processed. If [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk) or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

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#### What forms of ID will I need to provide in order to access this?

riskpriorityindex.co.uk accepts the following forms of ID when information on your personal data is requested:

- *An email request originating from the email address held within [www.riskpriorityindex.co.uk](http://www.riskpriorityindex.co.uk), responses will only be returned to that originating email address.*
- *An email confirmation from the Client's System Administrator on your behalf*

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## Contact details of the Data Protection Officer (DPO):

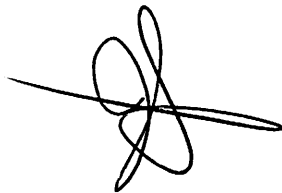
	<b>Data Protection Officer (DPO) Contact Details</b>
Contact Name:	Ian Griffiths
Address line 1:	80 Manor Road North
Address line 2:	Hinchley Wood
Address line 3:	Esher
Address line 4:	Surrey
Address line 5:	KT10 0AD
Email:	<a href="mailto:support@riskpriorityindex.co.uk">support@riskpriorityindex.co.uk</a>
Telephone:	020 8339 12855

## Document Owner and Approval

The Data Protection Officer (DPO) is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all clients and users of the service through a link at <http://www.riskpriorityindex.co.uk/privacystatement.pdf>

Signature:



Date:

24-05-2018

## Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Ian Griffiths	01/05/2018