Data Protection Policy

Astrum is fully committed to protecting the rights and privacy of individuals, in accordance with the Data Protection Act 1998. Information about our personnel, candidates and other individuals will only be processed in line with established regulations. Personal data will be collected, recorded and used fairly, stored safely and securely and not disclosed to any third party unlawfully. As the lawful and correct treatment of personal information is critical to our successful operations and to maintaining confidence, Astrum is committed to:

- Protecting candidates' personal details, records and assessment outcomes
- Keeping candidates' and other individuals' personal data up to date and confidential
- Maintaining personal data only for the time period required
- Releasing personal data only to authorised individuals/parties and not unless permission is given to do so
- Collecting accurate and relevant data only for specified lawful purposes
- Adhering to regulations and related procedures to ensure that all employees who have access to any personal data held by or on behalf of Astrum are fully aware of and abide by their duties under the Data Protection Act 1998.

Candidates are required to report any allegation in relation to the unlawful treatment of personal data via their line manager. A complaint should be made in the event that candidates feel that records of their personal data have been:

- Lost
- Obtained through unlawful disclosure or unauthorised access
- Recorded inaccurately and/or in a misleading manner
- Provided to a third party without permission.

Where required, we will take appropriate action or corrective measures against unauthorised and unlawful processing, loss, destruction or damage to personal data.

We also have a responsibility to ensure that our on-site staff understand:

- The importance of data security to our customers
- The serious consequences of attempted theft of data
- How to spot suspicious behaviour concerning data
- How report such suspicions

It is ultimately the responsibility of the Managing Director to ensure that this policy is published and accessible to all personnel, candidates and any relevant third parties. However, the Account Managers for each office are responsible for ensuring this information is fully understood by their team and by the candidates who commence work in their area.

Signed  4th January 2023

Astrum
Commercial Cleaning Services

Procedures

Staff Awareness

Staff are given training on an annual basis on the following areas: why data security is important to us and our customers; the consequences of attempted theft of the same; how to spot suspicious behaviour; how to report that suspicious behaviour.

Attempted Theft of Data

Attempted theft of data on a customer site will follow our standard procedure for gross misconduct: suspended immediately on full pay, thorough investigation, disciplinary hearing, and dismissal if appropriate. On top of this, we will liaise closely with the customer, and would welcome the involvement of the police. We will give our full support to any criminal prosecution which the customer undertakes.

Attempted theft of our own data will be dealt with in the standard procedure for gross misconduct, as above. We would engage the police, and our policy is to prosecute to the full extent of the law.

Spotting & Reporting Suspicious Behaviour

At our customers' offices, we are often doing work out of normal working hours. This could be an ideal time for data theft to occur. Our staff are now trained on how to spot suspicious behaviour; a person they do not recognise at someone else's desk; fiddling underneath the desk with data sticks or similar; someone who appears to be on edge, constantly looking at the entrance to the office; if we happen to pass the screen, they may try to cover it up in some way.

As soon as one of our staff is suspicious, they know to report it immediately to their line manager, in our case the Contracts Manager. If they cannot contact their manager for some reason, they will call the Account Manager straight away. If possible, they will also inform the relevant person in the customer premises; either security or the normal customer contact. The Contracts Manager will also call the customer contact straight away, and will advise the cleaning operative what to do. This should allow the customer sufficient time to act immediately and prevent the possible theft. We will continue to liaise with the customer on this, and will offer any help we can to the following investigation or conviction.