

POLICY ON INFORMATION SECURITY AND DATA PROTECTION

As a recruitment company Grist Legal Recruitment processes personal data in relation to its own staff, work-seekers and individual client contacts. It is vitally important that we abide by the principles of the Data Protection Act 1998 set out below.

Grist Legal Recruitment holds data on individuals for the following general purposes:

- Staff Administration
- Advertising, marketing and public relations
- Accounts and records
- Administration and processing of work-seekers personal data for the purposes of work-finding services

The Data Protection Act 1998 requires Grist Legal Recruitment as data controller to process data in accordance with the principles of data protection. These require that data shall be: -

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with the data subjects rights
- Kept securely
- Not transferred to countries outside the European Economic Area without adequate protection.

Personal data means data, which relates to a living individual who can be identified from the data or from the data together with other information, which is in the possession of, or is likely to come into possession of, Grist Legal Recruitment.

Processing means obtaining, recording or holding the data or carrying out any operation or set of operations on the data. It includes organising, adapting and amending the data, retrieval, consultation and use of the data, disclosing and erasure or destruction of the data. It is difficult to envisage any activity involving data, which does not amount to processing. It applies to any processing that is carried out on computer including any type of computer however described, main frame, desktop, laptop, palm top etc.

Data may only be processed with the consent of the person whose data is held. By instructing Grist Legal Recruitment to look for work and providing us with personal data contained in a CV work-seekers will be giving their consent to processing their details for work-finding purposes.

Data in respect of the following is "sensitive personal data" and any information held on any of these matters MUST not be passed on to any third party without the express written consent of the individual:

- Any offence committed or alleged to be committed by them
- Proceedings in relation to any offence and any sentence passed
- Physical or mental health or condition
- Racial or ethnic origins
- Sexual life
- Political opinions
- Religious beliefs or beliefs of a similar nature
- Whether someone is a member of a trade union

Data subjects, i.e. those on whom personal data is held, are entitled to obtain access to their data on request and after payment of a fee. All requests to access data by data subjects i.e. staff, members, customers or clients, suppliers, students etc should be referred to the Managing Director.