



RCS Recycling Ltd

Data Protection Policy

RCS
RECYCLING LIMITED

MAKING A WORLD OF DIFFERENCE

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Document Control

Author Block

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1	06/01/19	NG	Initial draft in compliance with 218 regulations No previous issues for data protection.	<i>Richard Collier</i>
2	19/01/24	NG	Full policy review and section 4 updated.	<i>Richard Collier</i>

Printed versions of this policy are uncontrolled (i.e. may not be the current version).

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1.0 General Introduction

1.1 Policy Purpose

RCS Recycling's Data Protection Policy refers to our commitment to treat information of employees, customers and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

RCS Recycling shall as a minimum, comply with UK legislation and our contractual obligations.

1.2 Scope of the Policy

This policy refers to all parties including employees (both PAYE and subcontractors), job candidates, customers, suppliers and any others who provide any amount of information to us.

Who is covered under this Data Protection Policy?

Employees (including subcontractors) of RCS must follow this policy. External entity such as certification bodies and consultants are also covered. Generally, our policy refers to anyone we collaborate with or who acts on our behalf and may need occasional access to data.

2.0 Integration with other policies

This policy may need to be read in conjunction with following documents:

- Integrated Management System Manual
- Environmental Policy
- Records Maintenance Procedure
- Operations Procedure

3.0 Responsibilities

- 3.1 The Managing Director has overall responsibility for the implementation of this policy.
- 3.2 The Managing Director is named as the Data Controller for RCS Recycling, who is required to notify the Information Commissioner's Office (ICO) of the processing of personal data, this is included in a public register. The public register of data controllers is available on the ICO website.
- 3.3 The Managing Director is responsible for defining and implementing effective data protection practice and promoting compliance with staff on its requirements.

4.0 Policy Elements

As part of our operations, RSC needs to obtain and process a relatively limited quantity of information. Typically, the information covered by this policy includes any offline or online data that makes a person identifiable. These information types include names, addresses, photographs and financial data.

RCS collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up to date
- Collected fairly and only for lawful purposes
- Processed by RCS within our legal and moral boundaries
- Protected against any unauthorised access by internal or external parties.

Our data will not be:

- Communicated informally
- Stored for more time than is absolutely necessary
- Transferred to any organisations, that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities).

In addition to ways of handling the data, RCS has direct obligations towards people to whom the data belongs. Specifically we must:

- Let people know which of their data is collected
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data held by us in either paper or electronic form.

5.0 Actions

To exercise our data protection principles, we shall:

- Restrict access to sensitive data
- Develop transparent data collection processes
- Train employees in online privacy and security measures
- Establish clear procedures for reporting privacy breaches or data misuse
- communicate statements on how we handle data
- Establish best practice data protection practices (document shredding, secure locks, frequent backups, access authorisation etc).

6.0 Disciplinary

All principles described in this policy shall be strictly adhered to. Any breach of this policy and any RCS guidelines relating to it, will invoke disciplinary and possibly legal action.



Richard Collier
Managing Director

22nd February 2024