CR STEEL LIMITED
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CR Steel Ltd - Data Protection Policy

1. Purpose

CR Steel Ltd is committed to protecting the rights, privacy, and security of all individuals whose personal data we process. This policy sets out how we comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Scope

This policy applies to:
- All employees, contractors, and temporary staff
- All personal data processed by CR Steel Ltd
- All systems, processes, and activities involving personal data

3. Our Data Protection Principles

We follow the six UK GDPR principles. Personal data must be:
1. Lawful, fair, and transparent
2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up to date
5. Kept only as long as necessary
6. Processed securely

4. Lawful Basis for Processing

We process personal data under one or more of the following lawful bases:
- Contract – to deliver goods and services
- Legal obligation – including tax, employment, and health & safety
- Legitimate interests – running and protecting our business
- Consent – where freely given and withdrawable

5.Types of Personal Data We Process

Depending on the relationship, we may process:
- Contact details (names, emails, phone numbers)
- Business details (job roles, company information)
- Financial information (invoices, payment details)
- Employment data (for staff only)
- CCTV footage (for site security)

We do not process special category data unless legally required.

CR Steel Limited: Registered in England & Wales.
Reg No. 4246758. Registered Office: Home Barn Farm, Frolesworth Road, Sharnford, Leicestershire, LE10 3AD.

6. Data Security

We implement appropriate technical and organisational measures, including:
- Controlled access to systems and workshop areas
- Secure storage of digital and paper records
- Password protection and multi-factor authentication
- Regular data backups
- CCTV operated for security and crime prevention
- Staff training on data handling and confidentiality

7. Data Sharing

We only share personal data when necessary and lawful, including with:
- Customers and suppliers (for operational purposes)
- Professional advisers (accountants, insurers, legal advisers)
- IT and cloud service providers
- Regulatory bodies where legally required

We never sell personal data.

8. Data Retention

We retain data only for as long as necessary:
- Financial records: 6 years
- Contract records: duration of contract + 6 years
- CCTV footage: typically 30 days, unless required for investigation
- HR records: as required by employment law

9. Individual Rights

Individuals have the right to:
- Access their data
- Correct inaccurate data
- Request deletion (where applicable)
- Restrict or object to processing
- Data portability
- Withdraw consent

Requests are handled within one month.

10. Data Breaches

Any suspected breach must be reported immediately to the Data Protection Lead. Where required, we will notify the ICO within 72 hours and affected individuals without undue delay.

11. Responsibilities

- Directors: overall accountability
- Data Protection Lead: day-to-day compliance
- All staff: follow this policy and report concerns

12. GDPR Compliance Programme

CR Steel Ltd maintains an ongoing GDPR compliance programme which includes:

- Maintaining a **Record of Processing Activities (ROPA)** for all personal data handled by the business
- Annual **data protection audits** covering security, retention, access controls, and data accuracy
- Annual **policy reviews** or earlier if legislation or business operations change
- A defined process for handling **Subject Access Requests**, completed within one month
- A defined process for handling **data breaches**, including ICO notification within 72 hours where required
- Regular review of third-party processors to ensure GDPR-compliant contracts and safeguards are in place

13. Responsibilities for Handling Personal Data

- **Directors** – overall accountability for data protection and ensuring adequate resources
- **Data Protection Lead** – manages day-to-day compliance, breach reporting, SARs, ROPA, and staff training
- **Workshop Manager / IT Lead** – ensures secure handling of digital systems, access controls, CCTV access, and secure disposal
- **All Staff** – follow data protection procedures, maintain confidentiality, complete training, and report concerns immediately

14. IT and Cyber Security Controls

CR Steel Ltd maintains the following technical and organisational security measures:

- **Firewall protection** on all network-connected devices
- **Anti-virus and anti-malware** software installed and updated automatically
- **Regular security patching** of operating systems and applications
- **Encrypted devices** for all company laptops and mobile devices
- **Multi-factor authentication** for cloud systems
- **Role-based access controls** ensuring staff only access data necessary for their role
- **Secure backup systems** with encrypted off-site/cloud storage
- **Secure disposal** of IT equipment and data-bearing media

15. Staff Training

All staff receive **annual data protection training**, including:

- GDPR principles and lawful bases
- Handling and storing personal data securely
- Recognising and reporting data breaches
- Confidentiality requirements
- Safe use of IT systems and phishing awareness

Training completion is recorded and monitored by the Data Protection Lead.

16. Policy Review

This policy will be reviewed annually or following significant changes in legislation, operations, or incident findings.

Approval

Approved by:

Ryan Heighton – Managing Director

Signature: 

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