
Flip Connect Fair Process Policy

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Contents

Scope	3
Name and details of our organisation	3
The contact details of the Data Protection Officer (DPO).....	3
Definition of Personal Data.....	3
Definition of Sensitive Personal Data	3
The legal basis for the processing.....	4
Where the processing is based on point (f) of Article 6(1)	4
The recipients of the personal data.....	4
Retention period / Criteria to determine retention period	5
The existence of each of the data subject's rights	5
The right to be informed	5
The right of Access.....	5
The right to rectification	5
The right to erasure.....	5
The right to restrict data	6
The right of data portability.....	6
The right to object.....	6
Rights in relation to automated decision making and profiling	6
How to contact us and further details	6
Got a question about how we use your information?.....	6

Scope

All data subjects whose data is processed by Flip Solutions Ltd under the General Data Protection Regulation (EU) 2016/679.

Name and details of our organisation

Company Name:	Flip Solutions Ltd
Company Registration Number:	4388217
Address:	The Maltings Bridge Street Hitchin Herts SG5 2DE
Telephone Number:	01462 417 100
Website:	www.flipconnect.co.uk
Email:	info@flipconnect.co.uk

The contact details of the Data Protection Officer (DPO)

Flip Solutions Ltd does not engage a dedicated Data Protection Officer. Responsibility for all Data related issues reside with the Board of Directors and more specifically with the Operations Director:

Name: Mr. Ben Smith

Email: dpo@flipconnect.co.uk

Definition of Personal Data

Any information related to a natural person or 'Data Subject' that can be used to directly or indirectly identify the person. It can be anything from a name, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer IP address.

The actual definition as defined by the applied GDPR Article 4 'Definitions' Paragraph 1 states that:

'Personal data' means 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.

Definition of Sensitive Personal Data

Article 9 of the applied GDPR states, the processing of special categories of personal data shall be prohibited.

- Racial or ethnic origin
- Political opinions
- Religious beliefs or other beliefs of a similar nature
- Trade union membership
- Genetic Data
- Biometric Data
- Physical or mental health
- Sexual life or sexual orientation
- Information relating to offences or alleged offences

The prohibition shall not apply if the conditions of Article 9 section 2 are met i.e. the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

If Flip Solutions Ltd request sensitive personal data we will always request for consent and inform you why and how the information will be used.

The legal basis for the processing

As an employer it is necessary to hold relevant information relating to our own employees and that concerning recruitment. As such Flip Connect Ltd. is a Data Controller as defined under GDPR.

- a) Internal personnel records for staff of Flip Connect Ltd.

Lawfulness of Processing is according to GDPR Article 6 1C 'processing is necessary for compliance with a legal obligation to which the controller is subject'.

- b) Internal payroll and pension records for staff of Flip Connect Ltd.

Lawfulness of Processing is according to GDPR Article 6 1C 'processing is necessary for compliance with a legal obligation to which the controller is subject'.

- c) Notification to HMRC, DWP and any regulatory authority deemed as lawful and correct.

Lawfulness of Processing is according to GDPR Article 6 1C 'processing is necessary for compliance with a legal obligation to which the controller is subject'.

- d) Records and documentation required for the recruitment of personnel into Flip Connect Ltd.

Lawfulness of Processing according to GDPR Article 6 1A 'the data subject has given consent to the processing of his or her personal data for one or more specific purposes'.

By consenting to this, the Data Subject is giving us permission to perform this action. Consent may be withdrawn at any time by emailing dpo@flipconnect.co.uk

Where the processing is based on point (f) of Article 6(1)

Processing is necessary for the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Flip Solutions Ltd. does not process data in relation to point (f) of Article 6(1).

The recipients of the personal data

For the purposes of processing as defined in *The legal basis for the processing*, the recipients of data are as follows:

- a) Internal personnel records for staff of Flip Solutions Ltd.

Recipients: Flip Solutions Ltd.

- b) Internal payroll and pension records for staff of Flip Solutions Ltd.

Recipients: Flip Solutions Ltd.

- c) Notification to HMRC, DWP and any regulatory authority deemed as lawful and correct.

Recipients: HMRC, DWP, National Employment Savings Trust (NEST)

- d) Records and documentation required for the recruitment of personnel into Flip Solutions Ltd.

Recipients: Flip Solutions Ltd.

Flip Solutions Ltd. does not transfer personal data to a third country or international organisation as stipulated in Article 46 or 47, or the second subparagraph of Article 49(1).

Retention period / Criteria to determine retention period

Flip Solutions Ltd. maintain a comprehensive set of Data Protection and Information Security policies which are reviewed annually. All such policies and procedures are communicated to employees on a regular basis. These policies include the Flip Solutions Ltd Retention Policy which lays down recorded retention periods for documents and data which are of a financial or business nature.

(Records and documentation required for the recruitment of personnel into Flip Solutions Ltd are retained for a period of no greater than one year from the date of receipt.

The existence of each of the data subject's rights

GDPR stipulates the principles relating to processing of personal data. Any processing of personal data should be lawful and fair. It should be transparent to natural persons that personal data concerning them are collected, used, consulted or otherwise processed and to what extent the personal data are or will be processed.

The right to be informed

The controller shall take appropriate measures to provide any information relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

The controller shall provide information on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The right of Access

This Fair Process Notice ensures that individuals are aware of and can verify the lawfulness of the processing according to their right of access. Information must be provided to the requestor without delay and at the latest within one month of receipt and if this is not adhered to the data subject the right to lodge a complaint with a supervisory authority the Commissioner.

The right to rectification

Data that is inaccurate or incomplete must be rectified if requested by the individual. This must be completed within one month, 2 months if complex. If no action is deemed necessary, this must be explained to the individual and information of their right to complain to the supervisory authority given.

The right to erasure

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) The data subject withdraws consent and where there is no other legal ground for the processing;
- c) The data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) The personal data have been unlawfully processed;
- e) The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject [under domestic law];

The right to restrict data

The processing of personal data can be restricted as follows:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the United Kingdom.

A data subject who has obtained restriction of processing shall be informed by the controller before the restriction of processing is lifted.

The right of data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) The processing is based on consent or on a contract pursuant to the applied GDPR

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The personal data must be provided, free of charge, in a structured, commonly used and machine readable form.

The right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Rights in relation to automated decision making and profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above shall not apply if the decision: (a) is necessary for entering into, or performance of, a contract between the data subject and a data controller; (b) is a "qualifying significant decision" for the purposes of section 13 of the 2017 Act; or (c) is based on the data subject's explicit consent.

How to contact us and further details

Got a question about how we use your information?

You can get in touch with our data-protection officer by email dpo@flipconnect.co.uk or write to the address below and mark it for their attention.

If you'd like any more details, or you have comments or questions about our privacy policy, write to us at:

Flip Connect
The Maltings
Bridge Street
Hitchin
Hertfordshire
SG5 2DE

If you want to make a complaint on how we have handled your personal information, please contact our data protection officer who will investigate the matter and report back to you. If you are still not satisfied after our response or believe we are not using your personal information in line with the law, you also have the right to complain to the data-protection regulator in the country where you live or work. For the UK, that's the Information Commissioner - <https://ico.org.uk/>.