

JK Rail Limited GDPR Policy

April 2023



The purpose of this policy is to ensure the company is complying with the General Data Protection Regulation 2018 principles, to protect our clients, candidates, staff and other individuals and to protect us as a company.

The company shall ensure that personal data is not disclosed, or access made available to such data to persons that have no authority to see such data. There will always be cases where the company feels it is right to break confidentiality, although this should be decided on a case-by-case basis whether this is appropriate. Access to medical records shall be limited to medical assessment personnel (including specialist suppliers) and the Rail Administrator. Access to personnel and financial records shall be limited to the Managing Director and the Rail Administrator, i.e. on a “need to know” basis; no one should have access to information unless it is relevant to their work.

The company is committed to:

- I. complying with both the law and good practice,
- II. showing fairness & transparency.
- III. showing integrity and confidentiality
- IV. respecting individuals’ rights
- V. being open and honest with individuals whose data is held.
- VI. providing training and support for staff who handle personal data, so that they can act confidently and consistently.
- VII. minimising data and storage
- VIII. keeping personal data no longer than is necessary for the purposes for which the personal data is processed.

The Managing Director is responsible for ensuring all staff are properly inducted into the Company. Consent from the individual is one way of complying with the Fair Processing Conditions covered under GDPR. Personnel records shall only be disclosed to other staff in order to arrange a method for payment and for communicating important safety information. In such cases, no consent is formally requested. Where outside parties request personal information, this shall not be disclosed without written consent from the staff. All persons attending a medical assessment and/or drugs & alcohol screening shall be required to sign consent before the procedures are carried out as part of the induction.

The Managing Director is responsible for reviewing the Policy at least annually.

Signed: *J. K. O'CONNOR*