

DUNCAN PRIVATE HIRE

General Data Protection Regulation (GDPR)

Information Storage, Processing and Sharing Policy

Document Control

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1. Introduction

The General Data Protection Regulation (GDPR) (EU) 2016/679 provides a legal framework that sets out how personal data must be handled. Duncan Private Hire ("the Company") is committed to full compliance with the GDPR and ensuring that all personal data is collected, stored, processed, and shared responsibly and lawfully.

This policy applies to all personal data held by Duncan Private Hire in relation to customers, employees, and third-party contacts, and outlines our responsibilities, guiding principles, and procedures.

2. Scope

This policy applies to all employees, contractors, and data processors acting on behalf of Duncan Private Hire who handle personal data in the course of their duties.

3. GDPR Overview

GDPR enhances the privacy rights of individuals and imposes specific responsibilities on organisations that collect or process personal data. It came into effect on 25 May 2018, replacing the UK Data Protection Act 1998.

4. The Eight Principles of Data Protection

Duncan Private Hire adheres to the following GDPR principles:

- 1. Lawfulness, Fairness & Transparency**
Individuals are informed of who we are, why we collect data, and how it will be used. We ensure transparency through clear privacy notices.
- 2. Purpose Limitation**
Data is collected for specified, explicit, and legitimate purposes only (e.g. booking fulfilment or employment compliance).

3. **Data Minimisation**
Only the minimum data necessary is collected and processed.
4. **Accuracy**
Data must be accurate and, where necessary, kept up to date. Driver data may be cross-referenced using DVLA tools (e.g. gov.uk view-my-driving-licence).
5. **Storage Limitation**
Data is not retained longer than necessary. Customer and staff information is retained for no more than three calendar months unless legally required otherwise.
6. **Integrity and Confidentiality (Security)**
Personal data is protected through access controls (e.g., password protection for digital files and locked storage for physical documents).
7. **Accountability**
The Company is responsible for, and must be able to demonstrate, compliance with all principles.
8. **Restricted Transfers**
Personal data will not be transferred outside the EEA unless adequate safeguards are in place.

5. Lawful Bases for Processing

Processing of data will be lawful only if at least one of the following applies:

- Consent has been given
- Processing is necessary for a contract
- Legal obligation compliance
- Protection of vital interests
- Public task or official authority
- Legitimate interests pursued by Duncan Private Hire, balanced against the rights of the data subject

6. Special Category Data

Processing of sensitive personal data (e.g. health status, criminal history) requires additional protection. Such data will only be processed if:

- Explicit consent has been given
- Required by law for employment
- Necessary to protect vital interests
- Necessary for legal claims or justice administration

7. Rights of Data Subjects

Individuals have the following rights:

1. **Right to be Informed**
Clear information is provided at data collection.
2. **Right of Access**
Individuals can request access to their personal data (Subject Access Request).
3. **Right to Rectification**
Inaccurate or incomplete data must be corrected within one calendar month.
4. **Right to Erasure**
Personal data may be deleted upon request in specific circumstances.
5. **Right to Restrict Processing**
Data can be limited from processing but still retained.

6. **Right to Data Portability**

Individuals may request a copy of their data in a portable format.

7. **Right to Object**

Processing can be objected to where based on public interest or legitimate interests.

8. **Rights in Automated Decision-Making and Profiling**

Individuals have rights over automated decisions.

8. Subject Access Requests (SAR)

SARs must be made in writing and will be fulfilled within one calendar month. Identification must be provided. Duncan Private Hire reserves the right to refuse or charge for requests that are manifestly unfounded or excessive.

(Refer to Appendix 1 – SAR Form)

9. CCTV Usage

Duncan Private Hire operates CCTV for security. Images are collected and processed in accordance with GDPR principles and are:

- Used solely for safety and security
- Stored securely
- Not retained longer than necessary
- Not shared externally unless legally required

10. Personal Data Breaches

In the event of a data breach:

- Duncan Private Hire will notify the relevant authority within 72 hours
- If the breach poses a high risk to individuals, those affected will be informed
- All breaches are recorded internally
- A breach response protocol is in place

11. Policy Review

This policy will be reviewed annually or sooner if legislation or operational needs require it. The review will ensure continued GDPR compliance.

Approved by:

Peter Simpson

Director, Duncan Private Hire

Signed Electronically

APPENDIX 1

Subject Access Request (SAR) Form

Complete this form to request access to personal data held by Duncan Private Hire. This assists us in efficiently locating and providing the requested information. Submission of ID is required.

SECTION 1: Requester Details

- Full Name:
- Address:
- Contact Number:
- Email:

SECTION 2: Are You the Data Subject?

(Please circle)

Yes / No

If no, provide written authorisation from the data subject and proof of both identities.

Acceptable Proof of Identity & Address

(Submit scanned copies only)

- ID: Passport, photo driving licence
- Address: Utility bill, bank statement (within 3 months)

SECTION 3: Data Subject Details (if different)

- Name:
- Address:
- Contact Number:
- Email:

SECTION 4: Information Requested

(Please describe the data you are seeking and any relevant details.)

SECTION 5: Purpose of Request

(Please tick if applicable)

- Why we are processing your data

- Who has access to your data
- The source of your data

SECTION 6: CCTV Data Request

Would viewing the images suffice? (Yes / No)

SECTION 7: Declaration

I confirm the above information is accurate and understand this request will be handled in accordance with GDPR.

Signed: _____ Date: _____