



Data Breach Policy

To comply with GDP Regulations

Purpose

A1 Sheet Metal Flues Limited T/A A1 Flue Systems holds and processes, and in some cases shares, considerable amounts of personal data; the following policy sets out the procedure to be followed to maintain its integrity and the course to take should there be a breach.

Scope

All employees of A1 Sheet Metal Flues Limited T/A A1 Flue Systems are obliged under the General Data Protection Regulations (GDPR) to maintain data security; casual workers, contractors, consultants, suppliers and external data processors are also bound by this policy. The objective is to prevent any breach, but in the event of a breach for it to be contained as soon as possible

Definition

Data security breaches include both confirmed and suspected incidents. For the context of this policy an incident is an event or action which may compromise the confidentiality, integrity or availability of systems or data, either accidentally or deliberately. An incident includes, but is not restricted to the following:

- Loss or theft of confidential or sensitive data or equipment on which such data is stored, or able to access (e.g. loss of laptop, USB stick, phone/iPad/tablet device, or paper record)
- Equipment theft or failure
- Unauthorised use of, or tampering with, data systems
- Attempts (failed or successful) to gain unauthorised access to data
- Unauthorised disclosure of sensitive/confidential data
- Hacking attack
- Unforeseen circumstances such as fire or flood
- Human error
- Incidents where information may have been divulged by deceiving employees as to who the organisation is

Discovery of a Breach

Any employee of A1 Sheet Metal Flues Limited T/A A1 Flue Systems who discovers a breach (or suspected breach), or is informed of one, must immediately inform the Managing Director or, if he is not available, the next most senior member of staff. If the breach is discovered outside of working hours, contact should be made as soon as is practically possible. The Data Breach Report Form should be used and include full details of the incident, the nature of the breach and the number of individuals involved.

All individuals who are likely to be affected by the breach will be told immediately, but special urgency must be given to a breach that is likely to have financial impact on those involved.

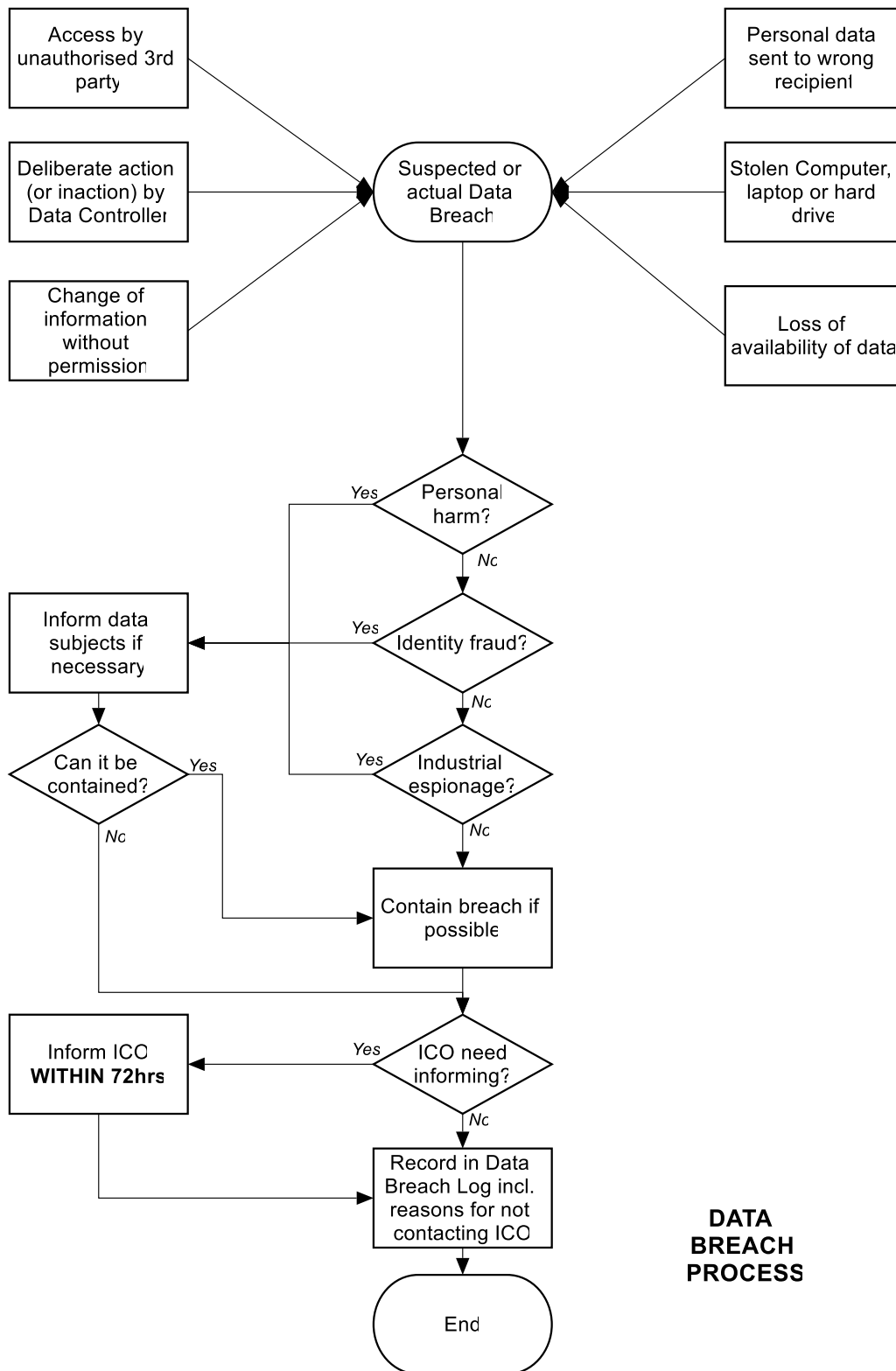
The Information Commissioners Office will be informed of the breach within 72 hours; employees will cooperate with them with any investigations they may wish to make.

All efforts will be made to recall the breach and if this is not possible for the breach to be contained.

Investigation

A1 Sheet Metal Flues Limited T/A A1 Flue Systems will conduct a full investigation into how the breach occurred and will exercise their right to disciplinary action if the breach has been caused deliberately, or by not following agreed company procedures.

Depending on the outcome of the investigation, new procedures may be introduced to prevent a similar breach recurring.



**DATA
BREACH
PROCESS**