



Sovini

# Sovini Ltd Data Protection Policy

Originator:	Policy and Strategy Policy
Approval date:	January 2025
Review date:	January 2028

1	Introduction
1.1	Sovini Ltd collects and uses Personal Data about people with whom it deals with in order to operate as a business. This data covers current, past and prospective employees, suppliers, customers, board members, contractors and others with whom it communicates.
1.2	This Policy sets out Sovini Ltd.'s responsibilities for dealing with all personal information, however it is collected, recorded and used. It relates to all information for which Sovini Ltd is the Data Controller (defined as the organisation and not the employees).
1.3	The Policy ensures Sovini Ltd complies with all applicable Data Protection Legislation, including the provisions set out in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Sovini Ltd will also ensure it is prepared for any changes to be introduced under the Data (Use and Access) Bill when this is approved as UK legislation.
1.4	<b>Access and Communication</b>
1.4.1	Sovini Ltd is committed to ensuring that our services are accessible to everyone. We will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for us or use our services.
1.5	<b>Equality, Diversity and Human Rights</b>
1.5.1	Sovini Ltd is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Expression, Sexual Orientation, Marriage and Civil Partnership, Maternity and Pregnancy and Religion and/or Belief.
1.5.2	Sovini Ltd also recognises that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

1.5.3	Sovini Ltd will also ensure that all services and actions are delivered within the context of current Human Rights legislation. Staff and others with whom we work, will adhere to the central principles of the Human Rights Act (1998).
1.6	<p>This should be read in conjunction with the:</p> <ul style="list-style-type: none"> <li>• Sovini Ltd Information Management Policy.</li> <li>• Sovini Ltd Equality, Diversity and Inclusion Policy</li> </ul>
<b>2 Statement of Intent</b>	
2.1	<p>In operating this Policy, Sovini Ltd will comply with the principles outlined in the UK GDPR and other relevant Data Protection Legislation, which requires that personal information:</p> <p>(a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');</p> <p>(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');</p> <p>(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');</p> <p>(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');</p> <p>(e) kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data are processed; Personal Data may be stored for longer periods insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation'); and</p> <p>(f) processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').</p>
2.2	Sovini Ltd have a designated Data Protection Officer (Data and Quality Assurance Manager) who takes a lead role for responding to data protection enquiries and for ensuring systems for data capture, storage and disposal are fit for purpose.
2.3	Sovini Ltd will respond to all requests for data protection information promptly and courteously.
2.4	Sovini Ltd will acknowledge all requests received for data protection information, submitted either verbally or in writing, within three working days and, subject to verification of identity

being confirmed, will provide a full response within 1 month (the corresponding date in the following month from receipt of the request).

2.5 Sovini Ltd will provide all new staff with data protection and information security training as part of their induction process and all other staff will receive refresher training annually. All staff will be required to comply with the Group's Computer Users Code of Operation and be made aware of their responsibilities for data protection via the Sovini Ltd Staff Handbook.

2.6 Sovini Ltd will adhere to the latest guidance notes and codes of practice produced by the Information Commissioner's Office (ICO) and these will be made widely available to Sovini Ltd staff via internal document control systems. Sovini Ltd is registered with ICO as its Data Protection regulatory authority.

2.7 Sovini Ltd will comply with any recommendations or judgements made by the Information Commissioner's Office should it be found to be in breach of any relevant Data Protection Legislation.

### 3 Policy

#### 3.1 Data Protection Definitions

3.1.1 For the purposes of this Policy and in compliance with relevant Data Protection Legislation the following definitions will apply:

- Sovini Ltd as an organisation (and not its employees) will be the Data Controller - who decide how 'Personal Data' is 'Processed' and for what purposes
- Processing of data or information (not just Personal Data) includes obtaining, recording, holding, organising, adapting, consulting, retrieving or otherwise performing some operation on it including disclosure of data. Sovini Ltd remains the Data Controller even when the processing may be carried out by the third party that Sovini Ltd shares the data with, for legitimate business purposes
- Personal Data is all data relating to a living individual who can be identified either from that data or from other information in the possession of the Data Controller. It includes expressions of opinion about that individual as well as any intentions that any person has regarding that individual. It also includes information likely to come into the Data Controller's (Sovini Ltd) possession as well as data already in its possession
- Personal Data also includes a specific sub-category known as Special Categories of Personal Data '**Sensitive Personal Data**'. This includes Personal Data which the Data Protection Legislation deems is sufficiently sensitive to warrant its own handling requirements owing to the potential damage that could result if it is not handled correctly. Sensitive Personal Data includes:
  - Race
  - Ethnic origin
  - Political opinions
  - Religious or philosophical beliefs
  - Trade union membership
  - Genetic data

- Biometric data (where this is used for identification purposes)
- Health data
- Sex life, or
- Sexual Orientation

- Although not in the list above, Data Protection Legislation states that information relating to criminal convictions or offences should also be handled with an increased level of care owing to its sensitivity
- A Data Subject – is the person about which Personal Data is held

## 3.2 Data Protection Usage

3.2.1 Sovini Ltd will only collect, store and use Personal Data for legitimate business purposes and will not forward on the information held to any third parties that may cause personal detriment or where such sharing of Personal Data has not been identified to the Data Subject in accordance with Sovini Ltd relevant Privacy Policy.

3.2.2 Where a law enforcement agency seeks Personal Data to assist in the apprehension of an alleged offender, the 'crime exemption' may apply. Any such request for disclosure should be forwarded to the Data Protection Officer.

3.2.3 Any sensitive Personal Data the organisation holds about a person will only be used for statistical purposes, to tailor services to meet individuals' needs or to ensure the organisation fulfils its aims outlined in the Sovini Ltd Equality, Diversity and Inclusion Policy.

3.2.4 Occasionally it will be necessary for Sovini Ltd to share Personal Data it holds about individuals for legitimate business purposes and to provide housing related services. An example here is the sharing of names and addresses of customers with those who Sovini Ltd employs to provide maintenance and repair services.

3.2.5 Where these companies are within the Sovini Group they will be subject to Group wide confidentiality statements and protocols surrounding the use of shared computer systems that are designed to protect the integrity and misuse of Personal Data.

3.2.6 Where Sovini Ltd is required to share Personal Data with third parties outside of the Sovini Group on a regular basis it will endeavour to ensure legal agreements are in place between the two organisations.

3.2.7 This can take the form of a contract, a confidentiality agreement or data processing agreement and will set out standards that the organisations will adhere to in processing of Personal Data, namely:

- That they will only use the Personal Data for the purposes for which it was intended
- They will keep the information secure and prevent unauthorised access
- That they will meet the requirements of the relevant Data Protection Legislation and will assist Sovini Ltd in meeting these requirements

3.2.8 In addition to the above agreements, Sovini Ltd will publish on its website a Privacy Policy which in broad outline will state:

- The legal basis why we process personal information
- The systems and practices we deploy to keep the information secure
- What purpose we are processing it for
- Whether you have to provide it to us
- Whether there are other recipients of your personal information and examples of the types of organisations that we may need to share your information with
- Your rights as Data Subject

3.2.9 Where it is necessary to request or share Sensitive Personal Data with third parties, Sovini Ltd will endeavour to obtain specific consent from the individuals concerned. However, in certain instances where it is a legal requirement Sovini Ltd is permitted to share Personal Sensitive Data and in such cases, consent is not required. Where applicable, the consent agreement will broadly outline:

- The name of your organisation with whom Sovini Ltd is sharing or requesting the information;
- The name of any third-party controllers who will rely on the consent;
- Why we want the data;
- What we will do with it; and
- That individuals can withdraw consent at any time

### 3.3 **Data Storage**

3.3.1 Sovini Ltd will maintain high standards of data security at all times and in line with the seventh principle of the Data Protection Legislation, will ensure:

- All employees are aware of and abide by the Group Computer User's Code of Operation:
- There are appropriate measures in place to protect Personal Data including password protected computer systems, confidential waste arrangements, secure office accommodation and good practice guidance issued to staff on storage of paper based Personal Data
- Contracts exist with any third-party data processor who processes information on Sovini Ltd.'s behalf

### 3.4 **Data Disposal**

3.4.1 Sovini Ltd will only hold and store personal information about individuals for as long as required within the provisions of the relevant Data Protection Legislation. When disposing of Personal Data, Sovini Ltd will only use registered confidential waste carriers that can provide certificates of destruction.

3.4.2 Sovini Ltd will also comply with the Waste Electrical and Electronic Equipment Directive (WEEE) when disposing of computer equipment and will ensure computer hard drives are effectively cleansed to prevent any loss of Personal Data.

### 3.5 **Access and the Rights of the Data Subject**

3.5.1 In compliance with the relevant Data Protection Legislation, Sovini Ltd will ensure that when individuals request, either verbally or in writing, access to personal information that Sovini Ltd holds about them, they will:

- Be told whether Personal Data is being processed, and if so:
  - Be told what data is being processed, why and to whom that data may be disclosed
  - Be given a copy of the information or data in an intelligible form
  - Be told the source of the data

3.5.2 In addition, and specifically in compliance with Data Protection Legislation, Data Subjects will also have the rights to the following:

- The right to rectification (to have the Personal Data Sovini Ltd hold about them to be changed or updated)
- The right to erasure (the right in certain circumstances for information to be safely disposed of)
- The right to restrict processing (the right where specific legal circumstances apply – as outlined in the UK GDPR, for processing to be changed or stopped, normally this would only be for a specific period of time)
- The right to data portability (for data to be transferred to another Data Controller or processor at the Data Subject’s request)
- The right to object (to processing of information for specific purposes – refer to UK GDPR for details)

3.5.3 The Data Protection Officer will be the designated person within Sovini Ltd for dealing with all data protection requests for information.

3.5.4 In most circumstances Sovini Ltd will comply with requests for access to personal information free of charge and would only consider charging a reasonable administrative fee, equivalent to the cost of retrieving the information, if the request is manifestly unfounded, excessive, or if repeat requests are made. Where a charge is to be levied, Sovini Ltd will inform the Data Subject and payment will need to be received before copies of data are released.

### 3.6 Exemptions

3.6.1 Sovini Ltd will not normally share or pass on Personal Data to any third parties without explicit consent (See 3.2.8 above for details). There are, however, a number of exemptions allowed within the Data Protection Legislation where Sovini Ltd may consider sharing information, as outlined below:

- The sharing is for the assessment of any tax or duty
- The sharing is necessary to exercise a right or obligation conferred or imposed by law (other than an obligation imposed by contract)
- the sharing is for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings)
- The sharing is for the purpose of obtaining legal advice
- The sharing is for research, historical and statistical purposes (so long as this neither supports decisions in relation to individuals, nor causes substantial damage or distress)
- The Data Subjects have given their consent
- The sharing is for the prevention or detection of crime

3.7	<p><b>Data Sharing</b></p> <p>3.7.1 Sovini Ltd will ensure data sharing protocols that exist with the Police and Local Authorities in the areas it operates adhere to guidance produced by the Association of Chief Police Officers and Association of Directors of Social Services.</p> <p>3.7.2 Sovini Ltd will ensure that where it is necessary for partnering contractors to share personal data about Sovini Ltd customers, they will not pass this information on to any third parties without Sovini Ltd.'s written consent. We will also ensure they agree to use the information only for the purposes it was originally intended.</p>
<b>4</b>	<b>Implementation</b>
4.1	<p>The Sovini Ltd Data Protection Policy applies to all staff and there is a collective responsibility to ensure adherence to the eight principles of UK GDPR and Data Protection Act 2018 (outlined above in section 2.1).</p> <p>4.2 All staff have a responsibility to inform the Data Protection Officer via their line manager if they become aware of any breaches of data protection. Any staff member that knowingly breaches data protection that leads to personal detriment may be subject to relevant disciplinary procedures.</p> <p>4.3 It is the responsibility of the Group Director for Governance and Compliance to ensure this Policy, and the supporting procedures are effectively implemented.</p>
<b>5</b>	<b>Performance</b>
5.1	<p>Sovini Ltd aims to have 100% compliance with the requirements of the relevant Data Protection Legislation. Sovini Ltd will record any breaches of data protection, adhere to recommendations or judgements made by the Information Commissioners Office and will use this information to improve data Protection provisions and amend the Policy and procedures.</p>
<b>6</b>	<b>Consultation</b>
6.1	<p>All staff have been consulted about the development this Policy.</p> <p>6.2 This Policy was subject to an external legal review in June 2018.</p>
<b>7</b>	<b>Review</b>
7.1	<p>This Policy will be reviewed every three years (from the date it is approved) by the Executive Management Team (EMT) to ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on the data Protection obligations of Sovini Ltd, changes to Sovini Ltd business practices or in the light of management system audits.</p>

<b>8</b>		<b>Equality Impact Assessment</b>	
8.1	Was a full Equality Impact Assessment (EIA) required?	No	
8.2	When was EIA conducted and by who?	An EIA Relevance Test was conducted by the Policy and Strategy Manager and the Policy and Strategy Administrator in November 2024.	
8.3	Results of EIA	The Relevance Test did not indicate there are any differential or adverse impacts for any group with protected characteristics as a result of the operation of this Policy.	
<b>9</b>		<b>Scheme of Delegation</b>	
9.1	Responsible committee for approving and monitoring implementation of the Policy and any amendments to it	EMT	
9.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Group Director Technology and Performance Improvement	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Group Director Technology and Performance Improvement	
<b>10</b>		<b>Amendment Log</b>	
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
24 <sup>th</sup> July 2018	In line with the introduction of revised Data Protection Legislation	See section 6 above	<ul style="list-style-type: none"> <li>Policy updated throughout to include relevant provisions to meet the requirements of UK GDPR and Data Protection 2018</li> </ul>
14 <sup>th</sup> September 2021	In line with the Review Schedule	See section 6 above	<ul style="list-style-type: none"> <li>There are no significant changes to the Policy in this review</li> </ul>
21 <sup>st</sup> January 2025	In line with the Review Schedule	See section 6 above	<ul style="list-style-type: none"> <li>Reference to new UK legislation Data (Use and Access) Bill added in section 1.3</li> <li>Change throughout Policy to state that Sovini LTD will accept both verbal requests and written requests for data protection information</li> </ul>