



**Data Protection POLICY**  
**for**  
**Phonics with Robot Reg**  
**Policy Statement**

Phonics with Robot Reg recognizes the importance of protecting personal data and is committed to ensuring compliance with applicable data protection laws and regulations, including the Data Protection Act 1998 (DPA) and General Data Protection Regulation (GDPR), which came into effect on May 25, 2018.

The GDPR is a comprehensive data protection law that sets out the rules and regulations for the processing and protection of personal data within the European Union (EU) and the European Economic Area (EEA). It provides individuals with greater control over their personal data and places increased obligations on organizations that handle and process personal data.

Under the GDPR, organizations are required to ensure that personal data is processed lawfully, fairly, and transparently. They must also obtain valid consent for processing personal data, protect data subjects' rights, implement appropriate security measures to safeguard personal data, and report data breaches when necessary.

Phonics with Robot Reg Franchising LTD, as an organization that handles personal data, is expected to comply with the GDPR and any applicable data protection laws and regulations in its jurisdiction. The organization should implement privacy policies and procedures that align with the principles and requirements of the GDPR, including obtaining consent, ensuring data security, providing data subjects with access to their personal data, and handling data breaches appropriately.

It is important for Phonics with Robot Reg Franchising LTD to keep abreast of the latest data protection laws and regulations in their jurisdiction to ensure compliance and protect the privacy rights of individuals whose data they handle.

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## ***Purpose***

The Company is committed to being transparent about how it collects and uses the personal data of its workforce, and to meeting its data protection obligations. This policy sets out the Company's commitment to data protection, and individual rights and obligations in relation to personal data.

This policy applies to the personal data of job applicants, employees, workers, apprentices and former employees, referred to as HR-related personal data. This policy does not apply to the personal data of clients or other personal data processed for business purposes.

The Company has appointed **Alex Burnside** as its data protection officer. Their role is to inform and advise the Company on its data protection obligations. Questions about this policy, or requests for further information, should be directed to the data protection officer or HR.

## ***Definitions***

**"Personal data"** is any information that relates to an individual who can be identified from that information alone or in combination with other identifiers the Company possesses or can reasonably access. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

**"Special categories of personal data"** means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

**"Criminal records data"** means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

## ***Data protection principles***

The Company processes HR-related personal data in accordance with the following data protection principles:

- The Company processes personal data lawfully, fairly and in a transparent manner.
- The Company collects personal data only for specified, explicit and legitimate purposes.
- The Company processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- The Company keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- The Company keeps personal data only for the period necessary for processing.
- The Company adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, accidental loss, destruction or damage.
- The Company will not transfer personal data to another country without appropriate safeguards in place.

The Company tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons.

Where the Company processes special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with a policy on special categories of data and criminal records data.

The Company will update HR-related personal data promptly if an individual advises

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that his/her information has changed or is inaccurate.

Personal data gathered during the employment, worker, relationship, or apprenticeship is held in the individual's personnel file (in hard copy or electronic format, or both), and on HR systems. The periods for which the Company holds HR-related personal data are contained in its privacy notices to individuals.

The Company keeps a record of its processing activities in respect of HR-related personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

### **Individual rights**

As a data subject, individuals have a number of rights in relation to their personal data.

#### *Subject access requests*

Individuals have the right to make a subject access request. If an individual makes a subject access request, the Company will tell him/her:

- whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- to whom his/her data is or may be disclosed, including to recipients located outside the EU/EEA and the safeguards that apply to such transfers;
- for how long his/her personal data is stored (or how that period is decided);
- his/her rights to rectification or erasure of data, or to restrict or object to processing;
- his/her right to complain to the Information Commissioner if he/she thinks the Company has failed to comply with his/her data protection rights; and
- whether or not the Company carries out automated decision-making and the logic involved in any such decision-making.

The Company will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

To make a subject access request, the individual should send the request to the HR department. In some cases, the Company may need to ask for proof of identification before the request can be processed. The Company will inform the individual if it needs to verify his/her identity and the documents it requires of the individual's data, it will respond within thirty days of the date the request is received.

If a subject access request is manifestly unfounded or excessive, the Company is not obliged to comply with it. Alternatively, the Company can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request

is likely to be manifestly unfounded or excessive where it repeats a request to which the Company has already responded. If an individual submits a request that is unfounded or excessive, the Company will notify him/her that this is the case and whether or not it will respond to it.

#### *Other rights*

Individuals have a number of other rights in relation to their personal data. They can require the Company to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;

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- stop processing or erase data if the individual's interests override the Company's legitimate grounds for processing data (where the Company relies on its legitimate interests as a reason for processing data);
- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override the Company's legitimate grounds for processing data.

To ask the Company to take any of these steps, the individual should send the request to the HR department.

In addition, individuals have rights to:

- be notified of a personal data breach which is likely to result in high risk to their rights and freedoms;
- Make a complaint to the supervisory authority.

### **Data security**

The Company takes the security of HR-related personal data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where the Company engages third parties to process personal data on its behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and Company measures to ensure the security of data.

### **Impact assessments**

Some of the processing that the Company carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, the Company will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the measures that can be put in place to mitigate those risks.

### **Data breaches**

If the Company discovers that there has been a breach of HR-related personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner

within 72 hours of discovery. The Company will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

### **International data transfers**

The Company will not transfer HR-related personal data to countries outside the EEA.

### **Individual responsibilities**

Individuals are responsible for helping the Company keep their personal data up to date. Individuals should let the Company know if data provided to the Company changes, for example if they move to a new house or change their bank details.

Individuals may have access to the personal data of other individuals and of our customers and clients in the course of their employment, contract, volunteer period, internship or apprenticeship. Where this is the case, the Company relies on individuals

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to help meet its data protection obligations to staff and to customers and clients.

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the Company) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the Company's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for work purposes.

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under the Company's disciplinary procedure.

Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

## **Use of Social Media**

**Responsible Use:** Franchisees, contractors, and representatives who use social media on behalf of Phonics with Robot Reg must do so responsibly and in accordance with this Data Protection Policy, the organization's Social Media Policy, and any applicable laws or regulations.

**Data Sharing:** Personal data shared on social media platforms should only be done in compliance with applicable data protection laws and with the explicit consent of the individuals involved.

**Privacy Settings:** Franchisees, contractors, and representatives should be mindful of their privacy settings on social media platforms and adjust them appropriately to protect personal data and maintain privacy.

**Monitoring:** Phonics with Robot Reg reserves the right to monitor social media activities related to the organization to ensure compliance with this policy, applicable laws, and regulations.

## **Training**

The Company will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter.

Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.

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