

DATA PROTECTION POLICY

Implementing GDPR



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Main Terms & Definitions

Personal Data is any data concerning to an identified or identifiable natural person.

Data Subject is the natural person to which the Personal Data refers and whose identity is known or may be confirmed, directly or indirectly, by reference to an national Insurance Card number or to factors specific to that person's physical, physiological, mental, economic, cultural, political or social identity.

Consent of the Data Subject means any freely given, specific, informed and unambiguous statement /acceptance by the Data Subject by which he/she agrees to the processing of his/her Personal Data by Highway Stops Retail Ltd.

Data Controller is the natural or legal person, public authority, an agency or any other body either, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

Data Processor is a natural or legal person, agency or other body which processes Personal Data on behalf of the Data Controller.

Processing means any processor set of operations which is executed on personal data or on sets of personal data, whether or not by automated means.

Such operations are the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

1. The Aim of the policy

- The aim of the current Personal Data Protection Policy is that «Highway Stops Retail Ltd », with registration number 7732029 with registered office address Unit 11 Metro Trading Centre, Second Way, Wembley, Middlesex, HA9 0YJ, will be referred below as (Highway Stops Retail Ltd.), is to follow, fulfill the GDPR and adopt procedures, as certain in relation with the collection, process and use of Personal Data by all data subjects.
- Highway Stops Retail requires to follow the provisions of General Data Protection Regulation (GDPR) 2016/679 and any national legislation, as amended from time to time, on the protection of natural persons in relation on the processing of personal data and on the free movement of such data.
- Highway Stops Ltd management is responsible for the Data protection. The Highway Stops retail Ltd's Directors, managers, tenderers, contractors, associates employees/personnel, customers, and pensioners need to be in compliance of the present General Data Protection policy.
- Therefore Highway Stops retail Ltd certifies that all the above categories comply with the present General Data Protection Policy.

2. What is the meaning of Personal Data?

Personal Data means any information/data relating to an identified or identifiable natural person ('Data Subject')

An identifiable person is one who may identified, either directly or indirectly, in particular by reference to the full name, an identification number, passport number, National Insurance Number, address or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

3. Who needs to provide Personal Data?

All natural persons needs to provide their personal Data such as any applicants, employees/ personnel, customers, tenderers, contractors, associates, job candidates, health fund members, and may be pensioners, therefore Highway Stops Retail Ltd may collect and processes the required Personal Data for lawful purposes.

Under the present Policy, the processing of Personal Data does not affect legal persons such as companies, organisations, associations, Institutions, government services and other legal entities.

4. Why Highway Stops Retail Ltd has to accumulate Personal Data?

Highway Stops Retail Ltd requires accumulating the Personal Data for all the below categories of natural persons for the following purposes:

- a. **From the Applicants**, to examine and processing their application.
- b. **From the Customers**, to provide services and/or goods.
- c. **From any Tenderers**, to evaluate their tenders.
- d. **From any Contractors/Associates**, to accomplish the objective of the collaboration.
- e. **From all Personnel/Employees**, to reach the goal of their employment.
- f. **From Recruitment Candidates applications**, to examine their job application according to the requirements of the specific vacancy.
- g. **From any Pensioners**, to ensure their rights and obligations.

5. What Personal Data does Highway Stops Retail Ltd require to accumulate?

The following Personal Data is accumulated by Highway Stops Retail Ltd, depending on the category:

1. **For Customers:** Full Name, National Insurance number and/or passport number and/or alien registration number, telephone number, postal address, e-mail address and residential address, previous positions held,
When using the web site or Wi-Fi:
 - Highway Stops Ltd systems have the ability to record data such as the browser, operating system and IP address.
 - With consent granted via email, Highway Stops Retail Ltd may gain access to the user's precise geographical location.
2. **For Tenderers:** Name and Surname, National Insurance number and/or passport number, telephone number, fax number, postal address, e-mail address, VAT number, CV, IBAN number document in case of a payment through bank transfer.
3. **For Contractors/Associates:** Name and surname, National Insurance number and/or passport number, telephone number, fax number, postal address, e-mail address, VAT number, CV, financial statements, IBAN number document for the purpose of payment through bank transfer.
4. **For Recruitment candidates, Personnel and/or Pensioners:** Name and surname, and/or Passport number, National Insurance number (if there is), Date of birth, telephone number, postal address, and/or residential address (if different), e-mail address, copies of academic and professional qualifications (if there are), payroll data, data related to personnel applications, authorizations for deductions and payments, IBAN document for payment through bank transfer (if required).

6. How does Highway Stops Retail Ltd collect Personal Data?

Highway Stops Retail Ltd collects from all the data subjects (or “natural persons”) their Personal Data, either directly from them or may be through their authorised representatives or by transferring Personal Data from a competent authority in one of the following ways:

1. Either in a letter or on a printed application form either these sent or handed to our office.
2. Verbally at our office or sometime through telephone communication to our office.
3. By online automated means (e-mail, website, Wi-Fi, software applications, GPS, vide or recordings and others means).

7. How Highway Stops Ltd process the accumulated Personal Data?

Highway Stops Retail Ltd processes the accumulated Personal Data in the following way:

- a. In the way is required for the execution of a business contract or to take all necessary steps or activities after an application is filled before a contract is created,
- b. for the purpose of compliance with the Law, and to the extent needed for the protection of its lawful interests,
- c. Where it is acquired explicit consent through Personal Data Consent Form.

8. For how long does Highway Stops Retail keeps Personal Data for?

Highway Stops Retail Ltd keeps Personal Data for the period as long as is necessary to fulfill the purposes providing services/goods and/or other legitimate purpose as set out in this privacy. In detail:

Processing of any data,

- a. Applications for services that either may have been rejected or not,
- b. for services and goods,
- c. evaluation of tenders,
- d. contracts with the goal of collaboration,

The Data is deleted in 10 years after completion:

1. after the final decision by Highway Stops retail Ltd to reject or
2. after the end of any court or other legal procedure or settlement

The reason that retention is needed for at least 10 years in case the applicant should decide to report Highway Stops Retail Ltd to the Commission for Data Protection, or take Highway Stops Retail Ltd to the courts.

For Employees/Personnel/Pensioners the data are deleted after they reach the age of 80 years old. The reason that retention is needed is in case the applicant should decide to report Highway Stops Retail Ltd to the Commission for Data Protection, or take Highway Stops Retail Ltd to the courts.

For candidates applications for recruitment that have been rejected, in 1 year after recruitment or until the end of possible court dispute.

For information collected through website, Wi-Fi, cookies, IP address etc. 2 years after they entered the system. The reason which is kept is for investigation of security purposes.

From video recordings from 3 days to 2 months after the recording, again it is kept for security purposes.

Longer retention periods may be appropriate where Highway Stops Retail Ltd considers, for example, specific legal or public interest reasons may apply.

9. How Highway Stops Retail Ltd protects your Personal Data?

Highway Stops retail Ltd takes all appropriate steps and measures either technical, administrative or organisational in order to comply fully with the provisions of the GDPR Regulation 2016/679 and any laws and at the same time takes all reasonable measures for the protection of the Personal Data from possible accidental or unlawful damage, alteration, loss, any unlawful distribution, access or any other possible unlawful processing.

Personal data either in electronic form or documents which are no longer required according to the retention periods are destroyed irrevocably.

Personal Data both in electronic form and in documents are stored securely and protected further by way of suitable access controls.

Who Highway Stops Retail Ltd may reveal our Personal Data?

Highway Stops Retail Ltd may reveal your Personal Data in the following instances:

- We may share your data to any natural person or company or other entity delegated Highway Stops Retail Ltd to implementing its behalf the processing of Personal Data;
- We may share your data to any natural person or company or public authority, or any other entity, if required by Law or after court decision or after a decision by a competent authority;
- We may share your data with third parties such as contractors/associates we engage or appoint to assist in providing our services;

Highway Stops Retail Ltd will not reveal, disclose or publish Personal Data to any other parties, except from the above cases without in advance informing the Data Subject and of course if so required to obtain his consent.

10. What are the Data Subject rights?

GDPR provides many rights to the Data Subjects. Therefore Data Controller of Highway Stops Retail Ltd may inform the Data Subject of his/her rights. Some of these are:

- **Information**
- The Data Subject
- has right to concise, transparent, Intelligible and easily accessible information using clear and plain language without undue delay and within 1 month of receipt to a
 - a) Request for such information unless due to complexity the period is extended by further 2 months. The information is provided in writing or electronic or other means, free of charge unless requests are clearly unfounded or excessive, in particular because of their repetitive character, when Highway Stops Retail Ltd charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested, or
 - b) Refuse to act on the request.
- **Information during the process of obtaining consent:** Highway Stops Retail Ltd informs the Data Subject during the process of collecting his/her data, the purpose of collecting his/her Personal Data, the period for which the Personal Data will be stored, his/her rights, the categories of Data and the source of any Data that has not been collected by Highway Stops Retail Ltd.
- **Access to Data” (Article15):** The Data Subject has the right to obtain a copy of his/her Personal Data and to be fully informed about the Data, the purposes of the processing, the categories of Personal Data, the storage period and the criteria used to determine that period, the recipients to whom the Data has been disclosed and the source of any Data that has not been collected by Highway Stops Retail Ltd.
- **Rectification/Amendment” (Article16):** The Data Subject has the right to rectification or complete of any incomplete Personal Data and his/her request must be satisfied without undue delay.
- **Right to Erasure “Right to be forgotten” (Article17):** The Data Subject has the right to request the erasure of his/her Personal Data without undue delay, unless the Data Controller has any legitimate interest.
- **Right to Restriction of Processing (Article 18):** The Data Subject may restrict the processing when he/she questions the accuracy of the Personal Data the processing is unlawful or/is no longer needed.
- **Right to Notification (Article19):** The Data Controller must communicate any rectification or erasure of Personal Data or restriction of processing to recipient to whom the Personal Data has been disclosed and inform the Data Subject accordingly.

- **Right to Data Portability (Article20):** The Data Subject has the right to receive his/her Personal Data in paper/digital form (whichever the data is available in) and he may transmit it to another organisation or request that is directly transmitted to another organisation.
- **Right to Object (Article21):** The data subject has the right to object at any time processing his data. In such a case the processing stops immediately after such an objection, unless the Data Controller has a lawful interest.
- **Right to Non-Automated Individual Decision-Making (Article22):** The Data Subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or significantly affects him/her.

The Data Subject has always the right to submit a complaint to the Information Commissioner's Office Personal Data Protection in case he/she believes that any of his/her rights have been infringed.

The Data Subject furthermore, has the right to withdraw his/her consent at anytime.

If a data subject withdraw his/her consent, this does not affect the legality of the processing which was based on it prior to withdrawal. If the Data Controller of Highway Stops Retail Ltd has a legitimate interest in keeping the Data Subject's Personal Data, his/her request to withdraw consent and have the data deleted may be denied.

11. How Highway Stops Retail Ltd treat with breaches of Personal Data?

The Information Commissioner's office will be notified within 72 hours for any leak and/or violations of being made. Furthermore Highway Stops Retail Ltd will notify the Data Subject (natural person) when there is a high risk of violation of his/her rights and freedoms.

12. Who is your Data Controller and Data Processor?

The Data Controller is "The Highway Stops Retail Ltd". The Data Processor is any natural or legal person that processes Personal Data on behalf of Highway Stops Retail Ltd.

13. Who is Highway Stops Ltd's Data Protection Officer?

Highway Stops Retail Ltd has appointed a Data Protection Officer (DPO), if you have any questions about this policy or how we process your personal data or exercising any rights under GDPR you may contact us. The DPO details are available on the Highway Stops Retail Ltd website. You may also contact him at the following address:

Highway Stops Retail Ltd Data Protection Officer

Address

Unit 11 Metro Trading Centre, Second Way, Wembley, Middlesex, HA9 0YJ

or by e-mail: enquiries@highwaystops.co.uk

14. Amendments to the Personal Data Protection Policy

From time to time Highway Stops Retail Ltd may update or amend the present Personal Data Protection Policy whenever it deems necessary to do so. We will publish the new version on the web site and where appropriate we will provide a copy of this. Please visit our website regularly.

This Personal Data Protection Policy was last reviewed on 20/02/2019