

## Data Protection, Control and Security Policy

Visual Interiors & Partitions Ltd is registered in England & Wales, Company Number 0576314.

Visual Interiors & Partitions Ltd needs to collect and use certain types of information about staff, suppliers, sub-contractors, clients, and other individuals whom it comes into contact within the course of its day-to-day business. This information must be dealt with properly however it is collected, recorded, and used - whether on paper, in electronic format on a computer, or recorded on other material - and there are safeguards to ensure this contained in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016.

Visual Interiors & Partitions Ltd regards the lawful and correct treatment of information as very important and therefore ensures that information is always treated lawfully and correctly. To this end the Company fully endorses and adheres to the Principles of Data Protection, as detailed in the Data Protection Act 1998 and the associated GDPR. The company is committed to the highest standard of information security and treats data security and confidentiality extremely seriously.

Due consideration is also given to the protection of any personal/client information stored on staff laptops, computers, mobile devices, the need for restriction of access to the information stored via password protection of the device and encryption to maintain confidentiality.

### For the purpose of the Policy:

- Business Information
- Confidential Information
- Personal Data
- Sensitive Personal Data

Specifically, the principles adopted by Visual Interiors & Partitions Ltd require that information.

- shall be processed fairly and lawfully and shall not be processed unless specific conditions are met
- shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
- shall be adequate, relevant, and not excessive in relation to the purpose or purposes for which they are processed
- shall be accurate and, where necessary, kept up to date
- shall not be kept for longer than is necessary for that purpose or those purposes
- shall be processed in accordance with the rights of data subjects under the Act
- appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data

Visual Interiors & Partitions Ltd will, through appropriate management, strict application of criteria and controls.

- observe fully conditions regarding the fair collection and use of information
- meet its legal obligations to specify the purposes for which information is used
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
- ensure the quality of information used
- all data held electronically must be securely backed up as soon as it is reasonably possible in accordance with the company's internal backup procedure
  
- apply strict checks to determine the length of time information is held
- ensure that the rights of people/companies about whom information is held, can be fully exercised under the Act / Regulation. (These include the right to be informed that processing is being undertaken, the right of access to one's personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong information)
  
- take appropriate technical and organisational security measures to safeguard personal information
- ensure that personal information is not transferred abroad without suitable safeguards
- treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation, or ethnicity when dealing with requests for information
- set out clear procedures for responding to requests for information.

In addition, Visual Interiors & Partitions Ltd will ensure that.

- there is someone with specific responsibility for ICO Data Protection – this being the responsibility of the Office Manager
- everyone managing and handling personal client information understands that they are contractually responsible for following good data protection practice
- anybody wanting to make enquiries about handling personal/client information knows what to do
- queries about handling personal/client information are promptly and courteously dealt with
- methods of handling personal information are clearly described
- a regular review is made of the way personal information is held, managed, and used
- methods of handling personal information are regularly assessed and evaluated
- performance with handling personal information is regularly assessed and evaluated
- staff or others working on behalf of the company will not introduce viruses, malware or malicious codes onto the system – should this happen in error, they are to report this immediately to a manager and IT consultant
- staff will not install or download from the internet any third-party software without it being checked and authorised by a manager and IT consultant

## Personal Email and Cloud Storage Accounts

- Personal email accounts (e.g. Google, Hotmail and Yahoo) and cloud storage services (e.g. Google Drive, iCloud and OneDrive) are vulnerable to hacking and do not provide the same level of security as server provided by the company's IT systems
- Staff must not use personal email accounts or cloud storage accounts for work purposes
- If large amounts of data need to be transferred, staff should speak to the Office Manager

## Working from Home

Unless required for authorised business purposes and only in accordance with subsequent paragraph, staff must not take information home with them.

Where information is permitted to be taken home, staff must ensure that appropriate technical and practical measure are in place within the home to maintain the continued security and confidentiality of the information, in particular all Confidential Information and Personal Data must be:

- Kept in a secure and locked location, where it cannot be accessed by others (including family members and guests)
- Retained and disposed of in accordance with the company's procedures
- Staff are not to store any Confidential Information on their home computers or other devices (i.e. laptops PC's or tablets)

This policy will be updated as necessary to reflect best practice in data management, security, and control and to ensure compliance with any changes or amendments made to the Data Protection Act 2018 (DPA 2018) or GDPR.

This policy applies throughout Visual Interiors & Partitions Ltd.'s scope of supply and in relation to all employees, key suppliers, contractors, and sub-contractors utilised by the business.

## Consequences of Non-Compliance

The company takes compliance with this Policy very seriously and failure to comply will put staff and the company alike at significant risk.

Due to the importance of this Policy, failure to comply with any of its procedures and requirements may result in a disciplinary action and possibly dismissal.

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