

Right to Erasure Policy

Introduction

The Data Protection Act 1998 and The EU General Data Protection Regulations 2018 regulates the way in which all personal data is held and processed.

This is a statement of the Right to Erasure policy that applies to all Progress Vehicle Management employees.

Purpose

The purpose of this policy is to ensure that everyone handling personal information at Progress Vehicle Management is fully aware of the requirements of the Regulations and complies with data protection procedures and that data subjects are aware of their rights under the Act/Regulations.

Definitions;

'Personal data' covered by the Act is essentially any recorded information which identifies a living individual. Personal data held by Progress Vehicle Management will include contact information and other personal data.

'Service provider' - Progress Vehicle Management

'Consumer' – Customer

'Staff' – Employees of Progress Vehicle Management

'ICO' – Information Commissioners Office

'The Act' - The Data Protection Act 1998 and The EU General Data Protection Regulations 2018

Safety & Security

A key role as Service Provider is the introduction of our staff and our clients to members of the public, we therefore have a duty of care to ensure the safety of all involved. Our staff are therefore required to record the full contact details of all participants involved in a transaction.

When consumers provide us with personal information we will only retain it for as long as we need to, to ensure we have dealt with all aspects of the enquiry or complaint.

In practice, this means that we are legally required to retain data. Once a consumer has been supplied information in our industry a 'transaction' has taken place. This being the primary reason for which data may be retained in accordance with the regulations.

Progress Vehicle Management has a secondary legal requirement to retain data for the provision of data to public authorities & in order to comply with legislation or regulations included but not limited to those listed below.

- The Terrorism Act 2000 (as amended by the Anti-Terrorism, Crime and Security Act 2001 & the Terrorism Act 2006)
- The Proceeds of Crime Act 2002 (as amended by the Crime and Courts Act 2013 and the Serious Crime Act 2015)
- Immigration Act 2014
- The Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013
- The Consumer Protection from Unfair Trading Regulations 2008

- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017

We therefore adopt a policy on request of Right to Erasure that the data is put 'beyond use'. The data is anonymised & 'locked down' within our system; this means that apart from the Data Protection Officers, the data will no longer appear to exist to all other members of staff, or be visible on any of our computer systems and/or reports.

Retention Policy

From time to time consumers ask that their data be deleted. Once a consumer's data falls outside of our Legal Retention periods, a consumer may insist that their data is deleted. We will delete and advise the consumer within writing that their request has been fulfilled.

In the unfortunate event that we have a legal requirement to produce data by the courts, the police or other public authority, that request should be made in writing to The Data Protection Officers, details of which can be found below and/or on our website. The Data Protection Officers will facilitate the unfreezing of the data within the system to comply with the public authorities to produce said data.

Responsibility for Progress Vehicle Management compliance with the Act

Progress Vehicle Management's Data Protection Officer Reports on any data protection matters to the Company board, but the individual members of staff are responsible for the proper use of the data they process.

Policy Statement

The principles of the Act require that personal information must:

- Be processed fairly and lawfully;
- Not be used for a purpose for which it was not collected;
- Be adequate, relevant and not excessive for the purpose;
- Be accurate and up-to-date;
- Not be kept longer than necessary;
- Be processed in accordance with the data subject's rights;
- Be kept secure and protected from unauthorised processing, loss or destruction; and

In order to meet the requirements of the principles Progress Vehicle Management will:

- Fully observe 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 the information used;
- Hold personal information on Progress Vehicle Managements systems for as long as is necessary for the relevant purpose, or as long as is set out in any relevant contract held with Progress Vehicle Management;
- Ensure that the rights of people about whom information is held can be fully exercised under the Act (these include: the right to be informed that processing is being undertaken; the data subject's right of access to their personal information; the right to prevent processing in certain circumstances; 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; and
- Ensure that personal information is not transferred outside the EEA without suitable safeguards.

Staff Responsibilities for Right to Erasure

Progress Vehicle Management will ensure that there is someone with specific responsibility for data protection in the organisation. The nominated person is the Data Protection Officer. The Data Protection Officer may be contacted at:

Data Protection Officer
Progress Vehicle Management
Progress Business Park
Hillside
Rushmore Hill
Knockholt
Sevenoaks
TN14 7NL
Email: compliance@progressvehiclemanagement.co.uk

Progress Vehicle Management will ensure that:

- Everyone managing and handling personal information understands that they are responsible for following good data protection practice;
 - This policy is available to each member of staff;
 - Everyone managing and handling personal information is appropriately trained and supervised;
- and
- Queries about handling personal information are promptly and courteously dealt with and clear information is available to all staff

Privacy

Progress Vehicle Management respects consumers' privacy. The information that consumers provide us with is to fulfil their requests within our company services and not for any other purpose. We will not share your data to any external companies which you do not provide consent for us to do so. Please see our consent policy available at; www.progressvehiclemanagement.co.uk

Request of Erasure;

If you wish to make a request of Erasure after reading this policy please email, compliance@progressvehiclemanagement.co.uk who will ask for you to complete a 'Personal Data Rectification-Erasure form'. This will advise you of your process to follow and the timeframe in which this process will be completed.

Complaints Procedure

Progress Vehicle Management aims to comply fully with its obligations under the Act. If consumers have any questions or concerns regarding Progress Vehicle Managements management of personal data, including their right to access data about them, or if they consider Progress Vehicle Management holds inaccurate information about them, they should contact Progress Vehicle Management Data Protection Officer or visit www.progressvehiclemanagement.co.uk for the rectification of data policy.

If consumers have any questions or concerns have not been dealt with adequately or that a subject access request they have made to PVM has not been fulfilled they avail themselves of the PVM complaints procedure which can be found at; www.progressvehiclemanagement.co.uk .

If consumers are still dissatisfied, they have the right to contact the office of the Information Commissioner, the independent body overseeing compliance with the Act: <http://ico.org.uk>