

# **Policy information 2025**

The Board of Directors have agreed that The Managing Director determines the purposes for which and the manner in which any personal data are held, or are to be processed.

## **The scope of policy**

The policy applies to all sites and offices the Managing Director is responsible for. Marsh has instructed our agencies to ensure full compliance with all and future UK & EU legislation

## **Purpose of policy**

Marsh Industries has introduced this policy to:

- complying with the law
- following good practice
- protecting clients, staff and other individuals
- protecting the organisation
- Types of data

Employees and customer details will be covered by this policy. For further data please visit the government website

## **Policy statement**

**Marsh Industries will:**

- comply with both the law and good practice
- respect individuals' rights
- be open and honest with individuals whose data is held
- provide training and support for staff who handle personal data, so that they can act confidently and consistently
- Notify the Information Commissioner voluntarily, even if this is not required
- Please note the guidance from Marsh on when breaches should be reported as this is one of the main changes from the current Data Protection Act and GDPR

## **Key risks**

Marsh Industries will to its best endeavours prevent:

- information about data getting into the wrong hands, through poor security or inappropriate disclosure of information
- individuals being harmed through data being inaccurate or insufficient

## **Responsibilities**

## **The Board / Company Directors**

Have overall responsibility for ensuring that the organisation complies with its legal obligations.

## **Data Protection Officer**

The Managing Director is responsible for

- Briefing the Board on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on tricky Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Notification to the Board
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data
- Approving contracts with Data Processors
- Outside Organisations

Marsh will seek advice from professional advisors to ensure compliance.

## **Employees & Volunteers**

All staff and volunteers are required to read, understand and accept policies and procedures that relate to the personal data they may handle in the course of their work.

## **Enforcement**

Breaches in compliance with Data Protection may result in disciplinary action

Security

Scope

Business Continuity is included below but you may want to move this to a separate policy

## **Setting security levels**

Brightwell Marketing & Blue Moon Computer Services will ensure adequate IT security systems are in place and maintained

## **Security measures**

Marsh will ensure its IT, Computer consultants and marketing companies have a fully compliant system. The company Lawyers will address any breach in compliance by third parties.

## **Data recording and storage**

**Accuracy**

Marsh will have measures in place to ensure data accuracy. For example, where information is taken over the telephone, how is it checked back with the individual? If the information is supplied by a third party, what steps will be taken to ensure or check its accuracy?

## **Updating**

Please note the separate requirements for the data we hold. For example, we cannot keep CVs for more than 6 months unless we have express permission from the candidates

## **Storage**

All information is stored electronically where ever possible

## **Retention periods**

A maximum period of 2 years with permission from individuals

## **Archiving**

The company stores invoices, its own bank information for 10 years employee data is held only when employed by the company

## **Right of Access**

### **Responsibility**

The directors are responsible for ensuring that right of access requests are handled within the legal time limit which is one month

### **Procedure for making request**

Right of access requests must be in writing. There should be a clear responsibility for all employees to pass on anything which might be a subject access request to the appropriate person without delay.

### **Provision for verifying identity**

Where the person managing the access procedure does not know the individual personally there should be provision for checking their identity before handing over any information

### **Procedure for granting access**

If the request is made electronically, we will provide the information in a commonly used electronic format.

The GDPR includes a best practice recommendation that, where possible, organisations should be able to provide remote access to a secure self-service system which would provide the individual with direct access to his or her information

## **Transparency**

### **Commitment**

Marsh will explain its commitment to ensuring that Data Subjects are aware that their data is being processed and

- for what purpose it is being processed
- what types of disclosure are likely, and
- how to exercise their rights in relation to the data

### **Procedure**

When Marsh deems there are standard ways for each type of Data Subject to be informed, these will be given, for example:

- the handbook for employees
- in the welcome letter or pack for members, with occasional reminders in the newsletter
- during the initial interview with clients
- on the website

## **Responsibility**

Individuals in the company are responsible for their actions when passing on information outside of working hours and the company premises.

## **Lawful Basis**

### **Underlying principles**

GDPR states we must record the lawful basis for the personal data we hold

### **Opting out**

Marsh Industries is not relying on consent, but will give people the opportunity to opt out of their data being used in particular ways

## **Withdrawing consent**

Marsh the organisation may wish to acknowledge that, once given, consent can be withdrawn, but not retrospectively. There may be occasions where the organisation has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn

Employee training & Acceptance of responsibilities  
Induction

All employees who have access to any kind of personal data will have their responsibilities outlined during their induction procedures

## **Continuing training**

There are opportunities to raise Data Protection issues during employee training, team meetings, supervisions, etc.

Procedure for staff signifying acceptance of policy

The policy will be included in the Company Handbook

## **Policy review**

### **Responsibility**

The board of directors are responsible for the review

### **Procedure**

Site Manager will be briefed on Data Protection regulation

### **Timing**

Review will be completed by January 2026

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