

# INTERNATIONAL DATA PROTECTION POLICY

NIRAS-LTS International (hereafter NIRAS-LTS) is fully committed to compliance with the requirements of the General Data Protection Regulation (the GDPR) which is enforced on 25 May 2018 and the Data Protection Act 2018 (the DPA).

NIRAS-LTS is a Data Controller and a Data Processor. As a Data Controller, we will conduct all activity relating to personal data in line with the requirements set out in the GDPR and the DPA, ensuring transparency to data subjects, and that their rights set out in the GDPR are met.

As a Data Controller, NIRAS-LTS must collect and use certain types of information about individuals with whom it interacts. These may include (for example); current, past and prospective employees, clients, sub-contractors, applicants involved with the Darwin Initiative and Illegal Wildlife Trade and suppliers. This list is not exhaustive. Information regarding personal data processing undertaken by and for NIRAS-LTS is set out in our Privacy Notice.

NIRAS-LTS will process all personal data according to the requirements of the GDPR and the DPA irrespective of its format, including for example paper copies and computer records.

NIRAS-LTS will use privacy by design in order to successfully ensure the lawful and correct treatment of personal data in order to maintain the confidence between the company and those with whom we interact. We will ensure that our data processing adheres to the GDPR principles and fully endorse these.

NIRAS-LTS undertakes to inform all those we interact with in this way, of our obligations in relation to these activities. We will regularly review our policy and procedures in line with GDPR requirements, ensuring continuous improvement and compliance.

## 1 Scope

NIRAS-LTS International is required to register with the UK Information Commissioner, who is responsible for the protection of personal data across the UK. Our registered data protection notification can be accessed via the [Information Commissioners Office \(ICO\) website](#).

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union and the European Economic Area. The GDPR regulates and protects the processing of personal data by using the law to protect our data and the way it is used by third parties and by recognising that personal data is a valuable asset which must be safeguarded and actively managed.

The GDPR applies to Data Controllers and Data Processors:

- Data Controllers determine the purposes and means of processing personal data;
- Data Processors are responsible for processing personal data on behalf of a controller

The GDPR places specific legal obligations on Data Controllers and Data Processors to maintain records of personal data and processing activities, including those of Data Processors acting on the Data Controllers instruction (if the two are not the same body). The GDPR does not apply to certain activities including processing covered by the Law Enforcement Directive, processing for national security purposes and processing carried out by individuals purely for personal activities.

## 2 GDPR Principles

Article 5 of the GDPR requires that personal data shall be:

*"a) processed lawfully, fairly and in a transparent manner in relation to individuals;*

*b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;*

*c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;*

*d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;*

*e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and*

*f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."*

Article 5(2) requires that:

*"the controller shall be responsible for, and be able to demonstrate, compliance with the principles."*

In order to meet the principles set out in the GDPR, NIRAS-LTS will:

- Maintain a Data Map documenting the types of personal data that is collected and processed, the purpose for which this is done, the process followed, the security of the personal data, the access and data subject rights that apply and compliance with each of the GDPR principles
- Ensure personal data is collected transparently and processed in line with legal requirements
- Ensure the purpose for which personal data is collected and used has been clearly specified
- Ensure personal data that is collected and used is for necessary means and only done so to the extent that is required to fulfil our business purposes
- Ensure the personal data we hold is accurate and maintained regularly, and checks conducted annually where necessary
- Ensure the personal data we hold is erased without delay, in line with our Information Retention Schedule, when the purpose for holding that personal data is no longer valid
- Ensure requests for rectification of personal data are dealt with in reasonable timescales
- Maintain our security standards in relation to personal data, auditing these in line with our Quality Management System, on an annual basis to ensure compliance with the GDPR

- Ensure personal data is not transferred to areas outside of the EU and EEA without undertaking full security checks to ensure the security and protection of the personal data

In addition to meeting the GDPR principles as set out above, NIRAS-LTS will ensure that our Data Protection Policy, associated procedures and the policies and procedures of our Data Controllers are reviewed annually to allow for continuous improvement and compliance. NIRAS-LTS will undertake to maintain employee knowledge and understanding of the GDPR across the company by way of staff training and refreshers every 3 years. Employees involved in collecting, managing and processing personal data will be appropriately trained, monitored and audited as part of our annual data protection audit. Compliance with this policy will be necessary as part of employee contracts.

Any subsequent changes to this policy must be agreed by the NIRAS-LTS Board of Directors, and the most up-to-date version be available for all employees and those we interact with in business.

## 2.1 Data Subject Rights

The GDPR sets out the following rights for data subjects:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

NIRAS-LTS will meet these rights by ensuring the rights of data subjects is clearly communicated through our Privacy Notice available on our website and that employees, clients, sub-contractors and project applicants of NIRAS-LTS are aware of how these rights apply to them.

NIRAS-LTS has provided contact information in this policy for which data subjects can use for enquiries they wish to make in relation to their rights or any aspect of our policy and procedures relating to data protection and the GDPR.

If you wish to make a Subject Access Request, to request information held about you by NIRAS-LTS in line with the data subject rights set out in the GDPR, you must communicate your request by email to [kimberly-kerr@ltsi.co.uk](mailto:kimberly-kerr@ltsi.co.uk).

You must include your full name, address, telephone number and email address so that we can contact you for further information should we require it in order to deal with your request. You should include any relevant information which will help us identify you, such as the dates during which you had contact with us. Please be as specific as possible about the personal data you are requesting as any lack of understanding on what you are seeking may cause a delay in dealing with your request.

NIRAS-LTS will reply to your request by acknowledging we have received it. We will respond to your request in full within one month of receipt. We reserve the right to extend the timescale for responding if your request is complex: we will inform you if this is necessary and clearly explain our reasoning.

We will respond to your request free of charge. If your request is complex and resource excessive, we reserve the right to refuse your request. If this happens, you will be informed of our reasoning within one month of receipt of your request and the process for lodging a complaint, if you wish to do so, with the Information Commissioners Office.

If we respond to your request, the information we provide will be in line with the GDPR and your data subject rights.

## **2.2 Data Security**

NIRAS-LTS takes the security of personal data seriously. We will ensure that we have compliant measures in place to protect and secure personal data in line with the GDPR and appropriate to its content. NIRAS-LTS will ensure the security measures in place provide protection against unauthorised or unlawful processing, accidental loss, destruction or damage.

NIRAS-LTS have a data breach procedure in place to help mitigate the impact of any data breach, including a personal data breach, which includes notifying the ICO within 72 hours of the breach becoming apparent to our organization.

## **2.3 Contact**

For enquiries relating to GDPR and the DPA in relation to NIRAS-LTS, please contact:

Kimberly Kerr, HR Co-ordinator; Email: [kimberly-kerr@ltsi.co.uk](mailto:kimberly-kerr@ltsi.co.uk)

Patrick Abbot  
*Managing Director, NIRAS-LTS International*

5<sup>th</sup> November 2020