Veloce Autos Ltd

Data Protection Policy

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1. Purpose

a) This policy outlines how Veloce Autos Ltd handles personal data.

b) To comply with GDPR and the Data Protection Act, strict processes are in place for all staff.

c) Contractors, consultants and partners must also comply with this policy.

d) We take our regulatory responsibilities seriously, and everyone has a duty of care under this policy.

2. Regulation

a) We are registered with the ICO as required to process personal data. Our ICO number is ZA772794.

b) Senior Management must ensure our ICO registration remains accurate and up to date.

c) We will keep processes updated in line with regulatory changes.

Key Definitions:

Personal Data: Information that identifies or relates to an identifiable individual.
Sensitive Data: Special category data including racial origin, political opinions, religious beliefs.
Controller: Determines purposes and means of processing data.
Processor: Processes data on behalf of a controller.

3. Data We Collect

For finance applications, we may collect:

- Name
- Date of Birth
- Address and residential status
- Marital status
- Employment information
- Income
- Driving licence details

- Bank details
- IP information
- Marketing preferences

We do not request unnecessary or sensitive information. We act as a Controller and sometimes a Joint Controller.

4. GDPR Principles

We adhere to the seven GDPR principles, including:

- Lawfulness, fairness, transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

5. Data Protection Rights

Individuals have the right to:
- Access their data
- Request corrections
- Request deletion
- Restrict processing
- Object to processing
- Data portability
- Be informed
- Contest automated decisions

Requests must be referred to Senior Management and identity verified. Some requests may not be possible due to legal obligations.

6. Internal Processes & Responsibility

a) Training
Staff receive GDPR training on induction and annually.

b) Subject Access Requests (SAR)
SARs must be identified quickly and handled within 28 days. Identity verification is required. Responses must be clear and only shared securely.

c) System Security
- Lock systems when unattended
- No storing files on local drives
- Strong passwords required

- Systems are encrypted and protected by antivirus and firewalls

d) Office Security
Access is restricted. All confidential material must be locked away.

e) Physical Information
No physical documents may leave the premises. Information must be disposed of using confidential waste.

f) Phone Security
Identity checks are required before discussing applications. No information may be shared without consent.

g) Mobile Phones
Personal mobiles are not allowed in the office and cannot be used for work purposes.

h) Personal IT
No personal devices may store or access company/customer data.

i) Confidentiality
Confidentiality must be maintained at all times, even after employment ends.

j) Consent
Consent must be obtained before running credit searches. Joint applicants must provide explicit consent.

k) Credit Reference Agencies
Customers must contact agencies directly for credit report information.

l) Marketing
Customers must be given an opt-out option. No customer is automatically opted in.

m) Retention
Data retention periods:
- Employee Data: 7 years
- Customer Data: 6–7 years
- Enquiries: 1 year

n) Privacy Impact Assessments
PIAs are required when changes affect data handling.

7. Data Protection Officer

Due to company size, we have not appointed a DPO. Oversight remains with Senior Management.

Monitoring & Compliance

Any data breach must be reported within 72 hours to both the ICO and affected individuals.

Review

This policy is reviewed annually. Updates are approved by Directors.

Confirmation

Staff must confirm they understand this policy and will follow its requirements. Breaches may result in disciplinary action.