

## **CASS Data Protection Policy**

British Board of Agrément (**BBA**), Bucknalls Lane, Watfod, Hertfordshire WD25 9BA

### **1. About this document**

During the course of BBA's activities in administering the Cavity Assessment Surveillance Scheme (**CASS**), BBA may process personal data (which may be held on paper, electronically, or otherwise) about householders, installers and assessors. BBA recognises the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 1998 (**DPA**). The purpose of this policy is to make data subjects aware of how BBA, its data users and any third parties who process data on behalf of BBA will handle personal data.

"**Personal data**" means information BBA holds about a data subject from which that person can be identified. It may include names, addresses, contact details and photographs of properties. "**Processing**" means doing anything with the data, such as obtaining, recording or holding the data and also organising, amending, using, disclosing or destroying the data.

### **2. Data protection principles**

BBA and any third parties who process data on BBA's behalf will comply with the eight data protection principles in the DPA, which state that personal data must be:

- a) processed fairly and lawfully;
- b) processed for limited purposes and in an appropriate way;
- c) adequate, relevant and not excessive for the purpose;
- d) accurate;
- e) not kept longer than necessary for the purpose.
- f) processed in line with individuals' rights;
- g) secure;
- h) not transferred to people or organisations situated in countries without adequate protection.

### **3. Fair and lawful processing**

For personal data to be processed lawfully, data must be processed on the basis of one of the legal grounds set out in the DPA. These include if the data subject has consented to the processing or that the processing is necessary for the performance of a contract with the data subject. BBA may also process data in order for it to comply with a legal obligation.

### **4. How BBA is likely to use personal data**

4.1 BBA will collect and process personal data about householders, installers and assessors legal, personnel, administrative and management purposes and to enable BBA to meet its legal obligations as CASS administrator. This may include data BBA receives from a data subject (for example, by completing forms or by corresponding with BBA by mail, phone, email or otherwise).

4.2 BBA and any third parties who collect data on BBA's behalf will inform data subjects about:

- a) the purpose or purposes for which BBA intends to process that personal data;
- b) the types of third parties, if any, with which BBA will share or to which BBA will disclose that personal data.

4.3 BBA will only process personal data for the specific purpose or purposes notified to data subjects or for other purposes specifically permitted by the DPA.

4.4 Personal data will only be processed to the extent that it is necessary for the specific purpose notified to the data subject or for other purposes specifically permitted by the DPA.

4.5 BBA will only use personal data for marketing purposes or disclose personal data to a third party for marketing purposes if it has obtained the data subject's prior consent. Consent is provided by the data subject ticking certain boxes on the forms used to collect data.

### **5. Accurate data**

BBA and any third parties who process data on BBA's behalf will take reasonable steps to keep the personal data they store accurate and up to date. BBA will take reasonable steps to destroy or amend data that it becomes aware is inaccurate or out of date.

## 6. Data retention

BBA and any third parties who process data on BBA's behalf will not keep personal data for longer than is necessary for the purpose for which it was collected. BBA will take reasonable steps to destroy data or erase data from its systems when it is no longer required.

## 7. Processing in line with data subject's rights

Data subjects have the right to:

- a) request access to any personal data BBA holds about them;
- b) prevent the processing of their data for direct-marketing purposes;
- c) ask to have inaccurate data held about them amended;
- d) prevent processing that is likely to cause unwarranted substantial damage or distress to them or anyone else.

## 8. Data security

8.1 BBA and any third parties who process data on BBA's behalf will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

8.2 BBA has in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. BBA will only transfer personal data to a third party if that third party agrees to comply with those procedures and policies, or if the third party puts in place adequate measures itself.

8.3 BBA will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

- a) **Confidentiality** means that only people who are authorised to use the data can access it;
- b) **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed;
- c) **Availability** means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on the CASS software platform instead of individual PCs.

8.4 Security procedures include:

- a) **Secure lockable desks and cupboards.** Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.)
- b) **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required.
- c) **Equipment.** Data users must ensure that individual monitors do not show confidential information to passers-by and that they log off from the CASS software platform when their PCs are left unattended.

## 9. Providing information to third parties

BBA will not disclose personal data to a third party without the data subject's consent unless it is satisfied that the third party is legally entitled to the data. Where BBA does disclose personal data to a third party, BBA will have regard to the eight data protection principles.

## 10. Subject access requests

Data subjects may make a formal request for information BBA hold about them. This must be made in writing. Any such request may be subject to a fee of £10 to meet BBA's costs in providing the data subject with details of the information BBA holds about them. All such written requests should be forwarded to BBA at the address shown at the start of this policy.