 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

AP-015 Data Protection Policy

1. Purpose	2
2. Scope	2
3. Related Documents	2
4. Responsibility.....	3
5. Policy.....	3
6. Definitions	5
7. Data Collection	6
8. Data Storage	8
9. Data Sharing	8
10. Data Retention	9
11. Data Subject Rights.....	9
12. Transfer of Data Outside of the E.U.....	10
13. Data Breach Management	10
14. Data Rights Requests	11
15. Policy Compliance	11
16. Policy Review	11
17. Revision History	12

 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

1. Purpose

The purpose of this policy is to outline the measures taken by Occupli Limited to manage all personal data that is processed by the company. This policy ensures that Occupli Limited's data processing activities comply with the General Data Protection Regulation (GDPR) and the ISO/IEC 27001 Information Security Management System (ISMS) standard, emphasizing the security, confidentiality, and integrity of personal data.

2. Scope

This policy applies to all managers, employees (permanent and temporary), and contractors working on behalf of Occupli Limited who are involved in processing personal data. It covers all personal data processed by Occupli Limited in its business operations, including employee, contractor, and client data.

3. Related Documents

- **AP-029 Network Security Policy**
 - **AP-035 Security Configuration Standard Policy**
 - **AP-037 Threat and Vulnerability Management Policy**
 - **ISO/IEC 27001** – Information Security Management Systems (ISMS)
 - **SOP 025 Data Breach Management**
 - **SOP 027 Data Rights Protection**
 - **Record of Processing Activities (RoPA)**
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 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

4. Responsibility

It is the responsibility of all Occupli Limited employees, contractors, and management to comply with this policy.

- **Senior Management:** Accountable for ensuring appropriate resources for compliance and continual improvement.
- **Data Champion:** Occupli Limited does not require a formal **Data Protection Officer (DPO)**. However, the **Data Champion** is responsible for overseeing GDPR compliance, handling data protection inquiries, and ensuring policy enforcement.
 - Occupli's Data Champion is Brendan O'Grady (IT Administrator)
- **Employees and Contractors:** Responsible for adhering to training and following established procedures for handling personal data.

5. Policy

5.1 Data Protection Commitment

Occupli Limited is committed to protecting personal data processed as part of its services and activities. This commitment includes:

- Processing personal data lawfully, fairly, and transparently.
- Implementing technical and organizational measures to prevent unauthorized access or disclosure.
- Ensuring alignment with **AP-016 IT Security Policy**, which defines encryption standards, access controls, and incident response procedures to protect against unauthorized access and data breaches.

 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

5.2 Legal Basis for Data Processing

Personal data will only be processed when there is a clear legal basis under GDPR, such as:

- Consent
- Contract
- Legal Obligations
- Vital Interest
- Public Interest
- Legitimate interests

Regular **risk assessments** will be conducted to ensure data processing activities comply with GDPR and align with Occupli Limited's **Record of Processing Activities RoPA**.

5.3 Risk Management

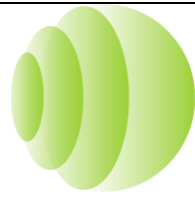
Occupli Limited employs a formal risk management framework to identify, assess, and mitigate risks associated with data processing:

- Risk assessments will be conducted periodically to evaluate potential threats to personal data.
- Controls will be implemented to mitigate risks identified during assessments.
- Residual risks will be monitored, reviewed, and documented.
- Risk management activities will align with **ISO/IEC 27001** standards.

5.4 Monitoring, Review, and Continual Improvement

Occupli Limited is committed to continually improving its data protection measures:

- **Monitoring:** Regular monitoring of data protection performance, including compliance checks and KPIs such as incidents of non-compliance and training completion rates.
- **Audits and Reviews:** Regular audits and reviews of data protection practices to ensure effectiveness and compliance with GDPR and **ISO/IEC 27001**.



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Putting Safety
To Work

AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien
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- **Corrective Actions:** Identified non-compliance issues will be addressed through documented corrective actions.
- **Alignment with IT Security:** Data protection measures will be aligned with **AP-016 IT Security Policy**, including regular security assessments and audits.

5.5 Employee Training and Awareness

To ensure robust compliance:

- All employees and contractors must complete mandatory data protection training upon onboarding and annually thereafter.
- Ongoing awareness campaigns will provide updates on regulatory changes and best practices.
- Training completion will be documented and tracked for audit purposes.

6. Definitions

6.1 Data

Information stored electronically, on a computer, or in certain paper-based filing systems, including IT systems.

6.2 Personal Data

Information relating to an identified or identifiable natural person, either factual (such as a name, address, or date of birth) or an opinion (such as a performance appraisal).

6.3 Data Controller

Data Controllers are individuals or organizations that determine the purposes and means of processing personal data.

 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

6.4 Data Processor

A Data Processor is a person who processes personal data on behalf of a data controller, excluding employees acting within their employment role.

6.5 Processing

Operations on data, including obtaining, recording, structuring, storing, retrieving, and erasing data.

6.6 Sensitive Personal Data

Specific categories of data, such as racial or ethnic origin, health information, and sexual orientation, which are processed under strict conditions and usually require explicit consent.


7. Data Collection

7.1 Employee Data Collection

Occupli Limited collects and processes employee data, including but not limited to:

- HR records (e.g., payroll, performance management)
- Security logs (e.g., login activity, access records)
- IT system monitoring data (e.g., email usage logs, device tracking where applicable)
- Any monitoring activities will be transparently communicated to employees.

Requests for access to HR data can be submitted per **SOP-027 Data Rights Protection**.

 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

7.2 Contractor Data Collection

Occupli Limited collects and processes contractor data for the purpose of fulfilling legal obligations and managing service contracts. This includes but is not limited to:

- Contractual details (e.g., service agreements, payment information).
- Security logs (e.g., system access, login records, remote access activity).
- Communications related to project work (e.g., email exchanges, collaboration tools).
- Any monitoring activities will be transparently communicated to contractors.

Requests for access to contractor data can be submitted per **SOP-027 Data Rights Protection**.

7.3 Client and Individual Data Collection

Occupli Limited collects and processes client and individual data to provide its services effectively. Personal data may be collected from:

- The company website (e.g., contact forms, account registrations).
- Recruitment platforms (for hiring-related data).
- Client interactions (e.g., contract agreements, service records).
- Digital communications (e.g., emails, support tickets).

Where client or individual data is used for analytical or service improvement purposes, **only anonymized or pseudonymized data** will be processed unless explicit consent is obtained.

Requests for access, rectification, or deletion of client data can be submitted per **SOP-027 Data Rights Protection**.

 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

8. Data Storage

8.1 Security of Personal Data

- Access to personal data is restricted to authorized personnel using strong authentication methods, as defined in **AP-094 Password Policy**.
- Encryption and security measures are implemented per the **AP-016 IT Security Policy** and **AP-035 Security Configuration Standard Policy**.

8.2 Data Transmission Security

Secure connections are used to protect personal data during transmission. Security controls related to data transmission will be governed by the standards established in **AP-029 Network Security Policy**.

9. Data Sharing

When personal data is shared with processors or sub-processors:

- Access is limited to authorized individuals who comply with **AP-094 Password Policy**.
- Security controls align with **AP-029 Network Security Policy**.
- **All third parties processing personal data on behalf of Occupli Limited must sign a Data Processing Agreement (DPA), in compliance with GDPR Article 28.**
These agreements define:
 - Security and confidentiality requirements.
 - Breach notification obligations.
 - Legal liability for data misuse.

 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

10. Data Retention

Personal data is retained only for as long as necessary to fulfil its purpose, as outlined in Occupli Limited's **Record of Processing Activities (RoPA)**. The RoPA details:


- Categories of personal data collected.
- Legal basis for processing.
- Retention periods.
- Data security measures in place.

Secure disposal methods are implemented in alignment with **AP-035 Security Configuration Standard Policy**.

11. Data Subject Rights

All individuals who avail of services with Occupli Limited are entitled to certain rights under GDPR, including:

- **Access** – Right to request personal data.
- **Rectification** – Right to correct incorrect data.
- **Erasure** – Right to delete personal data.
- **Restriction** – Right to restrict processing.
- **Data Portability** – Transfer their personal data to another controller. Data rights requests are handled as per **SOP 027 Data Rights Protection**.
- **Complaint** – Right to lodge a complaint.

 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

Data rights requests will be handled in accordance with **SOP-027 Data Rights Protection** to ensure that access, rectification, and erasure rights are protected consistently with the policy.

12. Transfer of Data Outside of the E.U.

Occupli Limited strives to ensure all personal data processing occurs within the **European Union (EU)**. Where transfers outside the EU are necessary, the company applies **GDPR-equivalent protections**, including:

- Standard Contractual Clauses (SCCs) where required.
- Verification that processors comply with **adequacy decisions** issued by the European Commission.

13. Data Breach Management

In the event of a personal data breach:

- The **SOP-025 Data Breach Management** procedure will be followed to contain and address the breach.
- **Occupli Limited will notify the Data Protection Commission (DPC) within 72 hours, where required under GDPR Article 33.**
- If the breach poses a high risk to individuals, **affected parties will be informed without undue delay**, in compliance with GDPR Article 34.
- Documentation of breaches, including corrective actions, will be maintained for audit purposes.

Printed Documents are uncontrolled and subject to change. Please refer to electronic document control system for current revision

 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

14. Data Rights Requests

Individuals who wish to make a data rights request must follow the established Data Rights Request procedure as outlined in **SOP-027 Data Rights Protection**.

15. Policy Compliance

All personnel and third parties must adhere to the **AP-015 Data Protection Policy**. Compliance is monitored through audits, with breaches reported to the **DPO**. Non-compliance may result in disciplinary action, legal penalties, and reputational harm.

16. Policy Review

This document will be reviewed **annually** to ensure compliance with evolving data protection laws, regulatory requirements, and industry best practices. Updates will incorporate changes in legal frameworks, security measures, and organizational data handling procedures.

 Occupli Putting Safety To Work				
AP-015 Data Protection Policy	Rev No: 4	Issue Date: 11-12-2024	Reviewer: B O'Grady	Approver: T O'Brien

17. Revision History

Rev	Date	Reason for Change	Author	Approver
0	14-09-2020	Initial Release	B Purcell	C Mee
Rev	Date	Reason for Change	Reviewer	Approver
1	14-09-2020	Update to reflect requirements of GDPR	B Purcell	O Molloy
2	16-09-2020	Change name of approver	B Purcell	C Mee
3	14-09-2023	Updated branding	B Purcell	O Molloy
4	11-12-2024	Enhanced GDPR compliance by clarifying Data Champion , data collection transparency, 72-hour breach notification , DPA s, RoPA , and cross-border data safeguards , ensuring ongoing regulatory alignment.	B O'Grady	T O'Brien