

			Data Protection & Privacy Policy			Risk Rating	High – Reviewed Annually	
Reference:	CP 009	Issue:	J	Reviewer:	Adam Brittin HR Advisor	Approver:	L Nicholson Head of People	<i>L Nicholson</i>
Issue Date:		28/02/2026	Compliance Date:		28/02/2026	Planned Review Date:	28/02/2027	

DATA PROTECTION & PRIVACY POLICY

Introduction

Buffaload Logistics is required to maintain certain personal data about current, past and prospective colleagues, clients, customers, and suppliers. In addition, it may be required by law to collect and use information in order to comply with the requirements of relevant third parties; for the purposes of satisfying operational and legal obligations.

Buffaload Logistics recognises the importance of the correct and lawful treatment of personal data. It maintains confidence in the organisation and provides for successful operations.

This personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 2018 and the UK General Data Protection Regulations (GDPR).

Buffaload Logistics fully endorses and adheres to the key data protection principles of the Data Protection Act. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation, and storage of personal data.

Colleagues and any others who obtain, handle, process, transport and store personal data for Buffaload Logistics must adhere to these principles and this policy. Please note that breaches to data security may be considered as Gross Misconduct and therefore if proven the Company may have to consider an individual's summary dismissal from the Company.

Principles

The 8 Data Protection principles:

1. Personal information must be transparent and fairly and lawfully processed.
2. Personal information shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal information must be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal information must be accurate and, where necessary, kept up to date.
5. Personal information processed for any purpose or purposes must not be kept for longer than is necessary for that purpose or those purposes.
6. Personal information must be processed in accordance with the rights of data subjects under this Act.
7. Personal information must be kept secure. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal information must not be transferred to other country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Satisfaction of Principles

In order to meet the requirements of the principles, Buffaload Logistics will:

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- Observe fully the conditions regarding the fair collection and use of personal data;
- Meet its obligations to specify the purposes for which personal data is used;
- Collect and process appropriate personal data only to the extent that it is needed to fulfil operational, health & safety and/or any legal requirements;
- Ensure the quality of personal data used;
- Apply strict checks to determine the length of time personal data is held;
- Ensure that the rights of individuals about whom the personal data is held, can be fully exercised under the Act;
- Take the appropriate technical and organisational security measures to safeguard personal data;
- Ensure that personal data is not transferred abroad without suitable safeguards.

Buffaload Logistics Designated Data Controller

The Company's Designated Data Controller is Lesa Nicholson (Head of People) and is responsible for ensuring compliance with the Data Protection Act and the UK General Data Protection Regulations (GDPR) and the implementation of this policy on behalf of the Managing Director. The Company's Designated Data Controller is supported by the IT Director and the Compliance Director. Any questions or concerns about the interpretation or operation of this policy should be taken up in the first instance with the Designated Data Controller.

Lesa Nicholson – Head of People
lesa.nicholson@buffaload.co.uk

The Information Commissioner maintains a public register of data controllers. It is the responsibility of the Company Designated Data Controller to ensure that the Information Commissioner is notified within 28 days of any changes and ensuring compliance.

Privacy Notice

The Purposes for which Personal Data may be held by the Company

- Recruitment, Promotion, Training, Career Development, References, CV's
- Administration and Payment of Wages (Bank/Building Society Details, Tax & NI Details).
- Emergency Contact Details, Next of Kin Details, Address & Date of Birth
- Calculation of Benefits, Pensions, Attachment of Earnings
- Disciplinary and/or Grievances
- Performance Management and Reviews (Appraisals, Probation, Driver Infringements & Driving Performance)
- Recording of Communications with Colleagues and their Representatives
- Compliance with Legislation; Licence Checking, Driver Card Details, Asylum & Immigration details
- Accident & Incident Information, Insurance Claims and Health, Safety and Welfare monitoring

Sensitive Personal Data

The Company may process sensitive data primarily where it is necessary to enable the Company to meet its legal obligations and in particular to ensure adherence to health and safety and vulnerable group protection legislation or for equal opportunities monitoring purposes. The Company will not process sensitive personal data without your written consent. Personal Data which is held by the Company may include sensitive personal data relating to the following matters:

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- Racial or Ethnic Origin
- Political Opinions
- Religious or similar beliefs
- Trade Union Membership
- Physical or Mental Health Condition
- Sexual Orientation
- Genetics
- Biometrics/Face Scan (Where used for identification)
- Criminal Record

Status of the Policy

This policy has been approved by the Managing Director and any breach will be taken seriously and may result in formal action. Any colleague who considers that the policy has not been followed in respect of personal data about themselves should raise the matter with the Company Designated Data Controller in the first instance.

Subject Access

All individuals who are the subject of personal data held by Buffaload Logistics are entitled to:

- Ask what information Buffaload Logistics holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed what Buffaload Logistics is doing to comply with its obligations under the Data Protection Act.

Colleague Responsibilities

All colleagues are responsible for:

- Checking that any personal data that they provide to Buffaload Logistics is accurate and up to date.
- Informing Buffaload Logistics of any changes to information which they have provided, e.g. changes of address including email address, bank details.
- Checking any information that Buffaload Logistics may send out from time to time, giving details of information that is being kept and processed.

If, as part of their responsibilities, colleagues collect information about other people (e.g. suppliers, customers, or contractor details or about colleagues in their directorate), they must comply with this Policy, Business Specific Operational Procedures and CP 003 – Information Technology & Security Policy.

Data Security

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted. All staff are responsible for ensuring that:

- Any personal data which they hold is kept securely.
- Personal information is not disclosed either orally or in writing or otherwise to any unauthorised third party, if unsure seek guidance from HR before actioning any request. Please note that you can be liable to prosecution if you deliberately give out personal details without permission.
- They use a strong password, in line with CP 003 – Information Technology & Security Policy.
- They do not send offensive emails about other people, their private life's or anything else that could bring the Company's name into disrepute.

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Whenever you are unsure of what is required or you otherwise need guidance in data protection, you should consult the Company Designated Data Controller. To help you understand and comply with Buffaload Logistics obligations as a Data Controller under the Data Protection Act you may request, training.

Reporting a Security Breach or Loss of Personal Data

If you are aware or suspect that there has been a security breach or a loss of personal data then you need to escalate this to the Designated Data Controller as soon as possible so this issue can be investigated.

Rights to Access Information

Colleagues and other subjects of personal data held by Buffaload Logistics have the right to access any personal data that is being kept about them on computer and also have access to paper-based data held in manual filing systems. This right is subject to certain exemptions which are set out in the Data Protection Act. Any person who wishes to exercise this right should make the request in writing to the Company Designated Data Controller.

If personal details are inaccurate, they can be amended upon request.

Buffaload Logistics aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days of receipt of request unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

Sometimes it is necessary to access individual business communications during their absence, for example, when they are off during illness, garden leave or while on holiday. Unless mailbox settings are such that the individuals who need to do this already have permission to view other inboxes, access will be granted in accordance with CP 003 – Information Technology & Security Policy

Access may also be granted in very limited circumstances subject to compliance with any legal requirements to access email marked PERSONAL. Examples are when we have reasonable suspicion that they may reveal evidence of unlawful activity; including instances where there may be a breach of this Policy and or a Contract within the Buffaload Logistics Business.

All company vehicles and assets are fitted with tracking and telematics which are used during operational working hours and enable us to:

- Manage the location of all company vehicles and assets at any time during operational working hours
- Collect data such as location of vehicle/asset at any given time, speed, trip details during operational working hours.
- Comply with H&S at Work Act 1974 by protecting the wellbeing of drivers by helping to spot and rectify dangerous driving and quickly recover vehicles and drivers after road traffic incidents.

Publication of Buffaload Logistics Information

Information that is already in the public domain is exempt from the 2018 Data Protection Act. This would include, for example, information on staff contained within externally circulated publications. Any individual who has good reason for wishing details in such publications to remain confidential should contact the Company Designated Data Controller.

Subject Consent (UK GDPR Regulations)

The need to process data for normal purposes has been communicated to all data subjects. In some cases, if the data is sensitive, for example information about health, race or gender, express consent to process the data will be obtained.

Retention of Data

Buffaload Logistics will keep some forms of information for longer than others. All staff are responsible for ensuring that information is not kept for longer than necessary and in line with company operating procedures, below is an overview of general record retention periods and where further guidance may be obtained in relation to the records.

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Type of Record	Retention Period	Format	Guidance
Accident books, accident records/reports	3 years from the date of the last entry (or, if the accident involves a child/young adult, then until that person reaches the age of 21). (See below for accidents involving chemicals or asbestos)>	Electronic/ Hard	Compliance Director
Health Safety and Environment Records	In line with Company Management Systems	Electronic	Compliance Director
General File Share	As defined by Business Departmental Head in order to fulfil business operational requirements/in line with operational procedures	Electronic	Head of IT
Email Accounts	Deleted 3 months after staff leave unless request submitted to IT to retain	Electronic	Head of IT
CVs and Job Applications (not recruited)	6 months after notification	Electronic/ Hard	Head of People
Disciplinary Records	6 years following end of employment	Electronic	Head of People
TUPE	In line with Company Management Systems	Electronic	Head of People
Staff Personnel Files	6 years following end of employment	Electronic/ Hard	HR/Payroll Manager/ Line Manager (while current)
Redundancy Records	6 years after redundancy	Electronic/ Hard	HR/Payroll
Sickness/Maternity/Adoption and Paternity Pay	3 years after the end of the tax year they relate to	Electronic/ Hard	Payroll
Wage/Salary (overtime, bonus, expenses)	6 years	Electronic	Payroll
Contractual/Client/Supplier information	5 years from when the business relationship ceases	Electronic	Commercial Director
National minimum wages records	3 years after the end of the pay reference period following the one that records cover	Electronic / Hard	HR/Payroll
CCTV Footage	30 days (unless footage required for investigational purposes)	Electronic	General Manager
In-Cab video footage	30 days (unless footage required for investigational purposes)	Electronic	General Manager
Licence Checking	Duration of Employment	Electronic / Hard	Compliance Director
Tachograph/Driving Hours/Infringements	2 Years from end of 17 week reference period	Electronic / Hard	Transport Managers
Telephone Recording	90 days (unless recording required for investigational purposes)	Electronic	Head of IT
Vehicle Tracking of all Company Vehicles/Assets	1 Year Live / 2 Year Archive	Electronic	General Manager
Accounting records	6 years for public limited companies	Electronic/ Hard	Finance Director
Income tax and NI returns, income tax records and correspondence with HMRC	Not less than 3 years after the end of the financial year to which they relate	Electronic / Hard	Finance Director
Medical records and details of biological tests under the Control of Lead at Work Regulations	40 years from the date of the last entry	Electronic / Hard	Compliance Director
Medical records as specified by the	40 years from the date of the last entry	Electronic /	Compliance Director

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Control of Substances Hazardous to Health Regulations (COSHH)		Hard	
Medical records and the Control of Asbestos of Work Regulations: medical records containing details of colleagues exposed to asbestos and medical examination certificates	(medical records) 40 years from the date of the last entry; (medical examination certificates) 4 years from the date of issue	Electronic / Hard	Compliance Director
Medical records under the Ionising Radiations Regulations 1999	Until the person reaches 75 years of age, but in any event for at least 50 years.	Electronic / Hard	Compliance Director
Records of tests and examinations of control systems and protective equipment under the Control of Substances Hazardous to Health Regulations (COSHH)	5 years from the date on which the tests were carried out	Electronic / Hard	Compliance Director
Records relating to children and young adults	Until the child/young adult reaches the age of 21	Electronic / Hard	Head of People / Compliance Director
Retirement Benefit schemes – records of notifiable events, for example, relating to incapacity	6 years from the end of the scheme year in which the event took place	Electronic / Hard	HR / Payroll

Supporting Material

CP 003 – Information Technology & Security Policy.

By signing you confirm that you have read and fully understand the contents of this document

Print Name	
Signature	
Date	