

Data Protection & GDPR Policy

JSPC Group LTD

1. Policy Statement

JSPC Group LTD is committed to protecting the privacy, confidentiality, and security of personal data. We recognise the importance of handling personal and sensitive information lawfully, fairly, and transparently, particularly when operating within the rail industry.

In alignment with the expectations of **Network Rail** and **Iarnród Éireann**, JSPC Group LTD will ensure that all personal data is processed in accordance with applicable data protection legislation and rail industry requirements.

Data protection is treated as a core governance responsibility alongside safety, ethics, and security.

2. Scope

This policy applies to:

- All directors, employees, and agency workers of JSPC Group LTD
- All subcontractors, suppliers, and business partners processing data on our behalf
- All personal data processed by JSPC Group LTD, including electronic and paper records
- All work activities, including labour supply, recruitment, training, and rail operations

Compliance with this policy is mandatory.

3. Legal, Standards, and Rail Industry Alignment

This policy is aligned with the following legislation, standards, and industry expectations:

United Kingdom – Network Rail Alignment

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**

- Network Rail Supplier Code of Conduct
- Network Rail Information Security and Assurance expectations

Ireland – Iarnród Éireann Alignment

- **EU General Data Protection Regulation (EU GDPR)**
- **Data Protection Acts 1988–2018**
- Iarnród Éireann Supplier and Contractor Requirements
- Iarnród Éireann Information Governance expectations

Best Practice

- ISO/IEC 27001 – Information Security Management Systems (principles)
 - UK Information Commissioner’s Office (ICO) guidance
-

4. Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual
 - **Special Category Data:** Data relating to health, medicals, biometrics, ethnicity, or other sensitive information
 - **Processing:** Any operation performed on personal data, including collection, storage, use, sharing, or deletion
-

5. Data Protection Principles

(UK GDPR / EU GDPR – Article 5)

JSPC Group LTD will ensure that personal data is:

1. Processed lawfully, fairly, and transparently
 2. Collected for specified, explicit, and legitimate purposes
 3. Adequate, relevant, and limited to what is necessary
 4. Accurate and kept up to date
 5. Kept only for as long as necessary
 6. Processed securely to prevent unauthorised access, loss, or damage
-

6. Lawful Basis for Processing

JSPC Group LTD will only process personal data where a lawful basis applies, including:

- Contractual necessity
- Legal obligation
- Legitimate interests
- Consent (where required)

Special category data, such as medical and drugs & alcohol records, will be processed only where additional lawful conditions apply.

7. Types of Data Processed

JSPC Group LTD may process personal data including, but not limited to:

- Employee and labour records
- Recruitment and vetting information
- Competency, training, and certification records
- Medical, drugs & alcohol, and fitness for duty information
- Contact details and identification data
- Client and site access information

All data will be processed only where necessary and proportionate.

8. Data Security and Confidentiality

(Network Rail & IE Information Assurance Expectations)

JSPC Group LTD will implement appropriate technical and organisational measures to protect personal data, including:

- Controlled access to systems and records
- Secure storage of electronic and paper records
- Password protection and system security
- Secure data transfer and disposal
- Limiting access to authorised personnel only

Loss, theft, or unauthorised disclosure of data will be treated as a serious incident.

9. Data Sharing and Third Parties

Personal data will only be shared:

- Where legally required
- Where necessary to meet Network Rail or Irish Rail requirements
- With authorised third parties under appropriate data processing agreements

JSPC Group LTD will ensure that third parties process data in accordance with GDPR and rail industry standards.

10. International Data Transfers

Where personal data is transferred outside the UK or European Economic Area (EEA), JSPC Group LTD will ensure appropriate safeguards are in place, such as:

- Adequacy decisions
 - Standard contractual clauses
 - Other lawful transfer mechanisms
-

11. Data Subject Rights

JSPC Group LTD respects the rights of individuals under GDPR, including the right to:

- Access personal data
- Rectify inaccurate data
- Erase data (where applicable)
- Restrict or object to processing
- Data portability

Requests will be handled within statutory timescales.

12. Data Breaches and Incident Reporting

(Network Rail & IE Incident Reporting Expectations)

All actual or suspected data breaches must be reported immediately.

JSPC Group LTD will:

- Investigate data breaches promptly

- Take action to mitigate harm
 - Notify the Information Commissioner's Office (ICO) or Irish Data Protection Commission where required
 - Inform Network Rail, Irish Rail, or affected parties where appropriate
-

13. Responsibilities

Directors and Senior Management

- Ensure effective data protection governance
- Allocate adequate resources for compliance
- Promote a culture of confidentiality and accountability

Managers and Supervisors

- Ensure compliance with this policy
- Protect personal data within their areas of responsibility
- Report data protection concerns promptly

Employees and Workers

- Handle personal data responsibly
 - Follow company procedures
 - Report data protection concerns or breaches immediately
-

14. Training and Awareness

JSPC Group LTD will:

- Provide data protection awareness during induction
 - Ensure staff understand their responsibilities
 - Reinforce good data protection practices
-

15. Retention and Disposal

Personal data will be:

- Retained only for as long as necessary

- Disposed of securely when no longer required
 - Managed in line with legal, contractual, and rail industry requirements
-

16. Monitoring, Review, and Continuous Improvement

This policy will be:

- Reviewed at least annually
 - Updated to reflect changes in legislation or rail industry requirements
 - Subject to monitoring and audit
-

17. Approval

This Data Protection & GDPR Policy has been approved by the Directors of JSPC Group LTD and is effective immediately.

Signed:

Director

JSPC Group LTD

Date: J. Sands