dormakaba UK & Ireland
Data Protection Special Category & Criminal Offence Data Policy

To apply to all dormakaba UK and Ireland employees

Department	Human Resources	
Version number	1	
Document status (Draft/Final)	Final	
Final effective		
Review date		
Reason for document	Statutory requirement under paragraph 39 of Schedule 1 to the Data Protection Act 2018.	
Linked documentation	1. Employee Privacy Policy 2. Data Retention/Erasure Schedule 3. Personal Data Breach Plan 4. Information Security Policy 5. ROPA 6. DSAR Process	
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Unique Reference Nº	Classification	Created	Version	Reviewed	Next Review
GDPR03	C1	10/01/2021	V2	21/08/2025	21/08/2026

Introduction

When processing personal data, **dormakaba UK & Ireland** will comply with the requirements of both the UK & EU GDPR, the Data Protection Act 2018 (DPA) and any associated legislation.

This Data Protection Special Categories of Data Appropriate Document Policy covers processing of special category personal data carried out by **dormakaba UK & Ireland** for which the following conditions have been met:

- As a data controller we are processing personal data which is the subject of Articles 9 or 10 of both the UK & EU GDPR.
- As a data controller we are processing this personal data in reliance of a condition listed in Parts 1, 2 or 3 of Schedule 1 of the DPA
- The condition listed in Parts 1, 2 or 3 of Schedule 1 includes a requirement for the data controller to have an Appropriate Policy Document.
- Schedule 1 Part 4 of the Data Protection Act 2018 provides additional safeguards that must be implemented when processing information relating to the following types of data.

1. Description of Data Processed

dormakaba UK & Ireland processes the following types of Special Category:

- Health and disability
- Religious/philosophical belief
- Ethnic/racial background
- Sexual life/sexual orientation
- Criminal Offence data

We do not process biometric or genetic data.

Please refer to the record of processing for further details.

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2. Condition(s) for Processing Data

dormakaba UK & Ireland relies on DPA Schedule 1 conditions to process special categories of personal data, for the purposes as set out at:

Part 1 - Conditions Relating to Employment, Health and Research, etc.

- Employment law - the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment.
- Processing personal data concerning health in connection with the organisation's rights under employment law, specifically preventive or occupational medicine and/or the assessment of the working capacity of an employee.
- Processing data relating to criminal convictions in connection with the organisation's rights under employment law in connection with our customer requirements and in line with Rehabilitation of Offenders Act 1974 (England, Wales and Scotland) and Rehabilitation of Offenders Order 1978 (Northern Ireland).
- Providing human resources and occupational health facilities for employees.

Part 2 - Substantial Public Interest Conditions

- Equality of opportunity or treatment
    - Is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.
- Occupational pensions
    - Fulfilling the organisation's obligation to provide an occupational pension scheme.
    - Determining benefits payable to dependents of pension scheme members.

Part 3 - Additional Conditions Relating to Criminal Convictions etc.

- Criminal conviction data will be collected, with employee consent, to ensure compliance relating to any customer requirements.

3. Securing Compliance with Data Protection Principles

In summary, Article 5 of the UK GDPR states that personal data shall be:

- Processed lawfully, fairly, and transparently.
- Collected for specific and legitimate purposes and processed in accordance with those purposes.
- Adequate, relevant, and limited to what is necessary for the stated purposes.
- Accurate and, where necessary, kept up to date.
- Retained for no longer than necessary.
- Kept secure.

In addition, Article 5 also states that the controller shall be responsible for and be able to demonstrate compliance with these above principles.

4. Lawfulness of Processing

In summary, Article 6 of the UK GDPR states the Processing shall be lawful only if and to the extent that at least one of the following applies:

- The data subject has given consent for one or more specific purposes.
- Processing is necessary for the performance of a contract.
- Processing is necessary for compliance with a legal obligation to which the controller is subject.
- Processing is necessary to protect the vital interests of the data subject or of another natural person.
- Processing is necessary for the performance of a task in the public interest.
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

This policy sets out how we comply with the principles, and we have a Data Protection Officer whose role it is to ensure compliance as well as that the procedures are followed, implemented, reviewed, and revised as required.

When processing special category & criminal offence data, the following procedures are used to ensure compliance with the data protection principles:

- Processed lawfully, fairly, and transparently.
  - Provision of relevant policies and appropriate documentation, accessible to all staff.
  - Use of data protection impact assessments to ensure proposed processing is carried out fairly.
  - Ensure that the Records of Processing Activities is set out for all required areas.

- Collected for specific and legitimate purposes and processed in accordance with those purposes.
  - The Record of Processing Activities sets out the purposes for which personal data will be used.
  - Personal data is not processed for other purposes without obtaining the data subject's consent unless authorised by law.

- Adequate, relevant, and limited to what is necessary for the stated purposes.
  - Use of data protection impact assessments to ensure that collected data is sufficient to provide the service but not excessive to protect individuals from harm.
  - Use of UK national guidance and relevant legislation to determine information that dormakaba UK & Ireland should collect.

- Accurate and, where necessary, kept up to date.
  - Correction of personal data when notified of inaccuracies by data subjects.
  - Ensure that personal data is accurate and kept up to date where necessary.

- Retained for no longer than necessary.
  - Retention periods are set out in the dormakaba Corporate Retention Policy & Records of Processing Activities.

- Personal data will only be kept as long as necessary for the purposes in which it was collected or where we have a legal obligation to do so.
- Retention periods are based on legal requirements, recommendations to retain data and on dormakaba standards.

- Kept secure.
  - dormakaba adheres to the Government's Minimum Cyber Security Standard and implements information security controls in line with ISO 27001.
  - Technical security controls are employed to secure sensitive information.
  - Role-based access controls are implemented to restrict access to sensitive data.
  - Where possible, anonymisation or pseudonymisation are used to reduce the risk of sensitive data being compromised.
  - Electronic data is protected by a secure network, VPN and password protected.

5. Retention and Erasure of Personal Data

dormakaba UK & Ireland retention period and disposal actions for records containing Special Category & Criminal Offence Data can be found in our 'Corporate Retention Policy.'

Please contact gdpr.GB@dormakaba.com for more information on our retention and disposal actions.

The policy will be kept under regular review.

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Updates to policy:

Review Date	Changes or Modifications	Approved by	Published

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