BUST THE DUST LTD

Data Protection and GDPR Policy

UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018

Company: Bust The Dust Ltd
Business sector: Domestic and Commercial Cleaning Services
Jurisdiction: United Kingdom
Policy owner: Company Director / Management
Effective date: 31 October 2026
Review date: 31 October 2027

1. Policy Statement

Bust The Dust Ltd is committed to protecting the privacy, confidentiality and personal information of its customers, employees, contractors, suppliers and other individuals with whom the company has contact.

The company recognises its responsibilities under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation.

We understand that working within customers' homes, offices and commercial premises may give employees access to personal, private and confidential information.

Bust The Dust Ltd will ensure that all personal information is collected, stored, used and shared lawfully, fairly, transparently and securely.

This policy establishes the standards and procedures that everyone working for or on behalf of Bust The Dust Ltd must follow when handling personal information.

Our commitment is to:

- Protect the personal information entrusted to us.
- Respect the privacy and confidentiality of customers and employees.
- Collect only information that is necessary for legitimate business purposes.
- Prevent unauthorised access, disclosure, loss or misuse of personal information.
- Ensure personal information is stored securely.
- Provide individuals with their legal data protection rights.
- Train employees to understand their responsibilities.
- Respond promptly to suspected data breaches.
- Review our procedures regularly to maintain compliance.

2. Purpose and Scope

This policy applies to all individuals working for or on behalf of Bust The Dust Ltd, including:

- Directors and management.
- Permanent employees.
- Temporary employees.
- Cleaning operatives.
- Contractors and subcontractors.
- Administrative and office staff.
- Any other individuals authorised to access company information.

It applies to personal information held in:

- Paper documents and files.
- Computers and laptops.
- Mobile phones and tablets.
- Emails and messaging applications.
- Customer databases and booking systems.

- Invoices and financial records.
- Staff records and recruitment documentation.
- Photographs, videos and CCTV footage, where applicable.

All individuals covered by this policy must understand and follow its requirements.

3. What Is Personal Data?

Personal data means any information relating to an identified or identifiable living individual.

Bust The Dust Ltd may collect or process the following categories of personal information:

Customer information

- Full names.
- Home and business addresses.
- Telephone numbers.
- Email addresses.
- Cleaning schedules and service preferences.
- Booking and appointment details.
- Payment and invoicing information.
- Property access arrangements.
- Key-holding and alarm access information, where applicable.

Employee information

- Names and contact details.
- Addresses.
- Employment history.
- Payroll and bank details.
- Emergency contact information.
- Training records.
- Sickness and absence records.

- Right-to-work information.
- Relevant health and safety information.

Supplier and contractor information

- Business contact details.
- Names of representatives.
- Payment information.
- Contract and service information.

Some information, such as health information, may constitute special category personal data and requires additional legal protection.

4. Lawful Basis for Processing Personal Data

Bust The Dust Ltd will only collect and process personal information where a lawful basis exists under the UK GDPR.

Depending on the circumstances, the company may rely on the following lawful bases:

Lawful basis	How it applies to Bust The Dust Ltd
Contract	Managing cleaning bookings, appointments and customer agreements.
Legal obligation	Meeting tax, payroll and employment requirements.
Legitimate interests	Managing customer relationships, business operations and service enquiries, where individual rights do not override those interests.
Consent	Optional marketing communications, where consent is the appropriate legal basis.

Vital interests	Protecting someone's life in an emergency, where applicable.

The company will identify and document the appropriate lawful basis before processing personal information.

Consent will not be used as a blanket justification for all data processing.

5. Collection of Personal Information

Bust The Dust Ltd will only collect personal information that is necessary for legitimate business purposes.

Information may be collected through:

- Telephone enquiries.
- Website contact forms.
- Email correspondence.
- Social media enquiries.
- Customer booking forms.
- Employment application forms.
- Contracts and service agreements.
- Direct communication with customers and employees.

Individuals will be informed about how their information is used through appropriate privacy information.

The company will not knowingly collect excessive or irrelevant personal information.

6. Customer Confidentiality and Privacy

Due to the nature of cleaning services, employees may enter private homes, offices and commercial premises.

Employees must respect the privacy of every customer and treat all information encountered during their duties as confidential.

Employees must never:

- Read customers' personal letters, paperwork or documents unnecessarily.
- Access computers, mobile phones or personal devices without permission.
- Discuss customers' private circumstances with other people.
- Share photographs or information about customers' properties.
- Disclose customer addresses, telephone numbers or access arrangements.
- Share information about customers on social media.
- Discuss one customer's arrangements with another customer.
- Use customer information for personal purposes.

Any accidental exposure to confidential information must be reported to management.

7. Property Access, Keys and Security Codes

Bust The Dust Ltd recognises that customers may entrust employees with keys, alarm codes, door-entry codes and other security information.

This information must be treated as strictly confidential.

The company will:

- Restrict access to keys and security information to authorised individuals.
- Keep keys securely stored when not in use.
- Avoid identifying keys with full customer names or addresses.
- Never share alarm codes or access information with unauthorised individuals.
- Ensure keys are returned or arrangements terminated when services end.
- Report lost or stolen keys immediately.

- Inform affected customers promptly where their property security may be at risk.

Employees must never copy keys or share access codes without management and customer authorisation.

8. Storage and Security of Personal Data

Bust The Dust Ltd will take appropriate technical and organisational measures to protect personal information against accidental loss, destruction, damage, alteration, unauthorised access or disclosure.

Security measures will include:

Electronic information

- Password-protected devices and accounts.
- Appropriate access restrictions.
- Secure storage of electronic records.
- Regular software and security updates.
- Secure email and communication practices.
- Multi-factor authentication where available and appropriate.

Paper records

- Locked filing cabinets or secure storage.
- Restricted access to confidential documents.
- Secure disposal of documents no longer required.
- Avoiding confidential paperwork being left unattended.

Mobile devices

- Password or biometric protection.
- Immediate reporting of lost or stolen devices.
- Avoiding the storage of unnecessary customer information.
- Not sharing devices or passwords with unauthorised individuals.

Personal information must never be stored on unsecured personal devices or shared through unauthorised applications.

9. Sharing Personal Information

Bust The Dust Ltd will not sell, rent or disclose personal information to third parties for their own marketing purposes.

Personal information may only be shared where necessary, lawful and appropriate.

Examples include:

- Accountants and payroll providers.
- HMRC and other relevant government authorities.
- Insurance providers.
- IT and software service providers.
- Payment processing providers.
- Legal advisers.
- Regulatory authorities where legally required.

Where third parties process personal information on behalf of the company, appropriate data processing agreements or contractual arrangements will be put in place.

The company will ensure that suppliers and service providers are subject to suitable confidentiality and security requirements.

10. Data Retention and Disposal Policy

Bust The Dust Ltd will not keep personal information for longer than necessary for the purpose for which it was collected, unless there is a lawful reason to retain it.

The company will maintain a retention schedule covering customer, employee, financial and business records.

The following are proposed retention periods, subject to applicable legal requirements:

Type of information	Proposed retention period
Customer enquiries not resulting in a booking	12 months
Active customer records	Duration of the relationship
Former customer records	Up to 6 years where necessary for legal or contractual purposes
Financial and tax records	Generally 6 years
Employee personnel records	Normally 6 years after employment ends, subject to the record type
Recruitment records for unsuccessful applicants	Normally 6–12 months
Customer keys and access codes	Only for the duration of authorised access
Accident and incident records	According to applicable legal requirements and insurance needs

These are working retention guidelines, not automatic retention periods for every record. Management will determine appropriate periods according to the type of information, its purpose and legal requirements.

When information is no longer required, it will be securely destroyed or permanently deleted.

Paper records will be shredded or disposed of using a secure confidential waste service. Electronic records will be securely deleted where appropriate.

11. Individual Data Protection Rights

Bust The Dust Ltd recognises that individuals have rights concerning their personal information.

These rights include:

1. Right to be informed: Individuals have the right to understand how their personal information is collected and used.
2. Right of access: Individuals can request a copy of the personal information held about them.
3. Right to rectification: Individuals can request correction of inaccurate or incomplete information.
4. Right to erasure: Individuals can request deletion of their personal information where the legal conditions are met.
5. Right to restrict processing: Individuals can request that certain uses of their information are restricted.
6. Right to data portability: Individuals may request certain information in a structured, commonly used and machine-readable format where the right applies.
7. Right to object: Individuals may object to certain types of processing, including processing based on legitimate interests.
8. Rights relating to automated decision-making: Individuals have protections concerning certain solely automated decisions that have legal or similarly significant effects.

The company will consider and respond to requests in accordance with applicable legislation.

11.1 Subject Access Requests

A customer or employee may request access to the personal information held about them.

Requests may be made verbally or in writing.

All requests must be forwarded to company management immediately.

The company will:

- Record the date the request was received.
- Verify the individual's identity where reasonably necessary.
- Identify and retrieve relevant personal information.
- Check that information relating to other individuals is appropriately protected.
- Provide the information securely.
- Respond without undue delay and normally within one calendar month.

Where a request is particularly complex or multiple requests have been received, the response period may be extended by up to a further two months where legally permitted. The individual must be informed within the initial response period.

In most circumstances, responding to a subject access request will be free of charge.

12. Personal Data Breach Policy

Bust The Dust Ltd will take all reasonable steps to prevent personal data breaches and respond appropriately if one occurs.

A personal data breach may include:

- Losing a customer file containing personal information.
- Sending an email containing personal information to the wrong recipient.
- Losing a mobile phone or laptop containing customer details.
- Unauthorised access to customer records.
- Theft of company paperwork.
- Accidentally disclosing a customer's address or contact details.

- Losing keys or access information where this creates a risk to an identifiable individual.
- Unauthorised sharing of photographs or information about a customer's property.

12.1 Reporting a Breach

Any employee who suspects or becomes aware of a data breach must report it to management immediately.

Employees must not attempt to conceal or ignore a breach.

Management will:

1. Establish what has happened.
2. Identify the information affected.
3. Identify the individuals who may be affected.
4. Assess the potential risk and consequences.
5. Take immediate steps to contain the breach.
6. Record the incident and actions taken.
7. Determine whether notification to the Information Commissioner's Office (ICO) is required.
8. Notify affected individuals where legally required.
9. Review procedures to prevent recurrence.

12.2 Reporting to the ICO

Where a personal data breach is likely to result in a risk to individuals' rights and freedoms, Bust The Dust Ltd will report it to the ICO without undue delay and, where feasible, within 72 hours of becoming aware of it.

Where the breach is likely to result in a high risk to individuals, the company will also inform affected individuals without undue delay, unless a relevant legal exception applies.

All personal data breaches will be recorded, including those that do not require notification to the ICO.

Official guidance: ICO – Personal Data Breaches.

13. Marketing and Customer Communications

Bust The Dust Ltd may contact customers regarding:

- Existing cleaning bookings.
- Appointment confirmations.
- Changes to cleaning schedules.
- Invoices and payments.
- Customer service enquiries.
- Important information relating to cleaning services.

Where the company wishes to send promotional or marketing communications, it will comply with applicable data protection and electronic marketing legislation, including the Privacy and Electronic Communications Regulations (PECR).

Marketing emails and text messages will only be sent where the company has an appropriate legal basis and satisfies applicable consent or customer relationship requirements.

Individuals will be given an appropriate opportunity to opt out of marketing communications.

Requests to stop receiving marketing communications will be actioned promptly.

14. Photographs, Videos and CCTV

Employees must not take photographs or videos of customers' homes, workplaces, possessions or personal belongings without appropriate permission and a legitimate business reason.

Where photographs are required to document cleaning work, damage, complaints or completed services:

- The customer must be informed.
- Permission must be obtained where appropriate.
- Only relevant images should be taken.
- Images must be stored securely.
- Images must not be shared on social media without separate appropriate authorisation.
- Images must not contain unnecessary personal or confidential information.

If the company uses CCTV at its own premises, it will ensure that appropriate signage, privacy information, access restrictions and retention arrangements are in place.

CCTV must not be used to monitor employees unlawfully or excessively.

15. Employee Responsibilities and Confidentiality

Every employee of Bust The Dust Ltd has a responsibility to protect personal information.

Employees must:

- Read and understand this policy.
- Keep passwords confidential.
- Lock devices when unattended.
- Avoid discussing confidential information in public.
- Never share customer details with friends, family or unauthorised colleagues.
- Keep paperwork secure.
- Report suspected breaches immediately.
- Follow management instructions regarding personal information.
- Complete relevant data protection training.

Employees must understand that confidentiality obligations continue after their employment with Bust The Dust Ltd ends.

A breach of this policy may result in disciplinary action, in accordance with the company's disciplinary procedures.

16. Data Protection Training and Awareness

Bust The Dust Ltd will ensure that employees receive appropriate data protection information and training.

Training will cover:

- Understanding UK GDPR.
- Recognising personal and sensitive information.
- Customer confidentiality.
- Secure handling of keys and access codes.
- Safe storage and disposal of records.
- Password and device security.
- Recognising phishing and suspicious emails.
- Reporting data breaches.
- Understanding individual data protection rights.

Training will be provided during induction and refreshed when necessary.

17. International Data Transfers

Bust The Dust Ltd will not transfer personal information outside the United Kingdom unless the transfer is lawful under applicable data protection legislation.

Where overseas IT providers, cloud storage services or other suppliers are used, management will check that appropriate international transfer safeguards are in place.

18. Data Protection Responsibilities and Management

The Directors and management of Bust The Dust Ltd are responsible for overseeing compliance with this policy.

Management will:

- Maintain appropriate records of data processing activities where required.
- Identify and document lawful bases for processing.
- Maintain appropriate privacy notices.
- Review data security arrangements.
- Manage data protection requests.
- Maintain records of data breaches.
- Review third-party service providers.
- Ensure employees understand their responsibilities.
- Review this policy regularly.

Where a Data Protection Officer (DPO) is legally required, the company will appoint one in accordance with applicable legislation.

Otherwise, management will nominate an appropriate person to oversee data protection matters.

Data protection contact

Name / Position: Deborah Docherty, nominated representative

Company: Bust The Dust Ltd

Email: bustthedust@myyahoo.com

Telephone: 07936509962

Postal address: 202-206 Linthorpe Road, Middlesbrough TS1 3QW

19. Complaints and Concerns

Any customer, employee or other individual who has concerns about how Bust The Dust Ltd handles their personal information may contact company management.

The company will investigate complaints fairly and respond appropriately.

Individuals also have the right to raise concerns with the Information Commissioner's Office.

Information Commissioner's Office (ICO)

Website: www.ico.org.uk

Telephone: 0303 123 1113

Individuals may also use the ICO website to make a data protection complaint.

20. Policy Review

This policy will be reviewed at least annually or sooner where:

- Data protection legislation changes.
- The company introduces new systems or technology.
- New services involve additional personal information.
- A serious data breach occurs.
- An audit identifies areas requiring improvement.
- Changes in business operations affect how personal information is handled.

All employees will be informed of relevant amendments.

21. Policy Approval and Employee Declaration

Bust The Dust Ltd confirms its commitment to protecting the personal information of customers, employees, suppliers and other individuals.

All employees are expected to comply with this policy as a condition of their employment and to maintain the highest standards of confidentiality, professionalism and data protection.

Failure to comply may result in disciplinary action and, where appropriate, further legal action.

Approved on behalf of Bust The Dust Ltd

Company Representative: Deborah Docherty

Signature: D. E. Docherty

Date: 31.10.26

Next review date: 31.10.27

Employee GDPR acknowledgement

I confirm that I have received, read and understood the Bust The Dust Ltd Data Protection and GDPR Policy.

I understand my responsibility to protect customer and employee information and agree to follow the company's data protection and confidentiality procedures.

Employee name: _____

Employee signature: _____

Date: _____