

Just Homes Information Systems Policy

Just Homes processes personal data in relation to its employees, clients and candidates, and we care about the data. We abide by the principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 set out below. It is important that our records are correct, as inaccurate or out of date information may affect your salary or cause difficulties in situations where contact is required for emergencies. You must notify the CEO immediately of all changes in the following personal information:

1. Name
2. Home address
3. Telephone number
4. Bank account details
5. Emergency contact
6. Criminal charge, caution or conviction

Just Homes holds data on individuals for the following general purposes:

- Employee Administration.
- Advertising, marketing and public relations.
- Accounts and records

The data will be processed in compliance with the principles of fair processing in Article 5, GDPR. Company will:

- Be transparent in relation to you.
- Tell you what we are collecting the data for and be specific about what our purposes for processing data are.
- Only collect what we need for the stated, legitimate purposes.
- Keep the personal data up to date and accurate – inaccurate data will be deleted or rectified.
- Not keep data in a form that allows identification of the data subject for longer than is necessary for the legitimate purposes notified to you.
- Keep the data secure.



Personal data means data, which relates to a living individual who can be identified from the data or from the data together with other information, which is in the possession of, or is likely to come into possession of, Just Homes. Data will only be processed in compliance with the following legal bases:

- Legitimate interest
- Legal obligation
- Consent

Data will be reviewed on a regular basis to ensure that it is accurate, relevant and up to date.

You are responsible for ensuring that any changes to old or inaccurate data takes place as soon as possible. In addition, you should ensure that adequate security measures are in place. For example:

- Computer screens should not be left open by individuals who are accessing personal information.
- Passwords should not be disclosed.
- Personnel files and other personal data should be stored in a place in which any unauthorised attempts to access them will be noticed. They should not be removed from their usual place of storage without good reason.
- Personnel files should always be locked away when not in use and when in use should not be left unattended.
- Care should be taken when sending personal data in the mail.
- Destroying or disposing of personal data counts as processing. Therefore, care should be taken in the disposal of any personal data to ensure that it is appropriate.

Data subjects are entitled to obtain access to their data on request. All requests to access data by data subjects i.e. employees, clients and candidates, should be referred to the CEO. Where a request is granted, the information will be provided within 30 days of the date of the request.

Internet, Email and Social Media

This policy includes access to, and use of, the Internet and sending and receiving e-mail or text/twitter messages. A breach of the rules may result in legal claims against you and us, and will be regarded as a disciplinary matter and dealt with in line with our disciplinary procedure. Serious breaches will be treated as gross misconduct and could lead to summary dismissal.



This policy applies to all employees working on any computer equipment (desktop, laptop, handheld computers, workstations, security and monitoring systems and mobile phones) belonging to Just Homes, either in our offices or elsewhere. It also applies if you bring your own device to work.

General Rules

The systems are for business purposes.

Ownership, storage and disclosure – we own all electronic documents and files that you create. Remember that e-mails:

- Are stored and may be inspected at any time;
- Are recorded and a hard copy can be made of them;
- Can be read by people other than the addressee; and
- May need to be disclosed in litigation.

A high degree of caution must be exercised when issuing information to outside individuals or companies. Sensitive confidential information should never be transmitted to outside individuals or companies via the facilities without the authorisation of the CEO. Care must be used in addressing data or messages to make sure that they are not sent to the wrong individual or company. In particular, exercise care in using email distribution lists to make sure that all addressees are appropriate recipients of the information.

It is unlawful to send unsolicited emails or mobile telephone text messages to individuals with whom there is no existing customer relationship unless those individuals have given their consent. Any unsolicited communications sent must include wording in the title or in the text enabling the receiver to opt-out of further contact in the future. If you are informed that an individual with whom Just Homes has an existing relationship or who has previously consented to receiving information wishes to opt-out of receiving such communications in the future, you must update the data relating to that individual immediately, and on no account must you continue to communicate with that individual by such means.

Please take care to ensure that all messages sent via email are courteous, professional, and business-like and do not contain any material, which would reflect badly on Just Home's reputation or standing. Email messages must not contain derogatory remarks about another person, as this may constitute libel. If you receive mail containing material that is offensive or inappropriate to the office environment, then you must delete it immediately. Under no circumstances should such mail be forwarded internally or externally.

Provided that it does not interfere with your performance or that of our systems the facilities *may* be used, *within reason*, for personal communications or to send and retrieve personal messages and to browse external websites for personal use although this should be done outside office hours or during your lunch break and be kept to a reasonable limit. If there is any evidence that this privilege is being



abused then the privilege may be withdrawn. The content of personal e-mails must also comply with the restrictions set out in this policy.

The following uses of the facilities are expressly prohibited:

- Viewing internet sites which contain pornographic, obscene, abusive, slanderous or otherwise offensive material or downloading/forwarding such material.
- Communications that are in violation of company policy including, but not limited to, the transmission of defamatory, obscene, offensive or harassing messages, or messages that disclose information without appropriate authorisation.
- Duplicating copyrighted or licensed software or other information without the appropriate authorisation.
- Forwarding or otherwise perpetuating “chain-letter” type email within or outside the organisation.
- Removal of any hardware or software from the premises without prior approval.

Passwords should be kept secure and are required to be changed regularly. To protect passwords, you should not access the facilities in the presence of others and confidential information should never be left open on the screen when equipment is unattended.

Monitoring and Interception

We respect your right to privacy but have to balance this with our business requirements and the need to protect Company from harm. For this reason, we may monitor and audit the use of our systems.

The Use of Social Media and Networking Sites

This policy outlines Just Homes’s position on the use of social media and networking sites whilst at work and in the course of company business. This policy has been created to outline and protect the commercial aspects of the business, Just Home’s reputation and the reputation of its employees.

Business Use

As a company, we recognise the benefit of using business social media and networking sites to assist you in the course of your role.

You must use your Just Homes contact details, including but not limited to email address, telephone number, or other appropriate Just Homes related information at all times. Please ensure that any reference to Just Homes describes Just Homes accurately and that any text is a true reflection of our business and meets our standards of professionalism.