
Personal Data Processing Procedures

Established May 25, 2018

Owned by - Data Protection Co-Ordinator

Document History

Issue	Date	Amendment Comment
Issue 1	01/01/2014	General Issue

Document Authorisation

Description	Name	Sign
Prepared By:	Mr M Jefkins	
Reviewed By:	Mr G Burnett	
Authorised By:	Mr A Bowden	

Procedure aims and objectives

So that personal data is processed appropriately, these procedures describe the procedures and forms that are necessary in order for employees of the Company and other persons to carry out the items that must be complied with in the General Personal Data Regulations (hereafter referred to as the Regulations).

Carrying Out a Data Protection Impact Assessment

The method for deciding whether or not to carry out a data protection impact assessment as prescribed in the Regulations is by using the Decision to carry out a Data Protection Impact Assessment Checklist (Appendix 1)

Collection of Personal Data

When collecting personal data directly from data subjects using documents (including electronic and magnetic media), we will notify or disclose the purpose of the data's use at the time of collection. This will clearly indicate the following items:

1. Name of the department that processes the personal data and the method of collecting it
2. The personal data which is being collected
3. Detailed contact information of the Global Data Protection Officer
4. Purposes of personal data processing and legal basis for such processing
5. If special categories of personal data will be collected, the fact that such data will be collected
6. If personal data will be transferred, the recipients or categories of recipients of personal data
7. Safeguards for transfers of personal data to a non-EEA country if such transfers will occur
8. Period for which personal data will be stored, or if no period can be decided, then the criteria used to determine that period
9. Rights of the data subject
10. Provided that the processing is based upon "consent", the right to withdraw consent at any time (However there is no effect on the processing which took place prior to the withdrawal of consent.)
11. Right to lodge complaints with the supervisory authority
12. Whether or not the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract
13. Possible consequences of failure to provide the data
14. Whether or not profiling will be performed, and if it will be, an overview of the profiling method

The notification items in 1 to 10 above can be replaced by a notification of the Privacy Policy.

When personal data is not obtained directly from the data subject we will clearly indicate the items shown below. The method of notification shall be by document (including electronic and magnetic media) presented to the data subject. However if the data subject is already aware, for example by means of the Privacy Policy posted on the Company website, then notification is not necessary. When notification to the data subject is significantly difficult or impossible, the method of notification shall be discussed with the Global Privacy Office.

1. Name of the department that processes the personal data and the method of contacting it
2. The personal data which is being collected
3. Detailed contact information of the Global Data Protection Officer
4. Purposes of personal data processing and legal basis for such processing
5. Categories of collected personal data
6. If personal data will be transferred, the recipients or categories of recipients of personal data
7. Safeguards for transfer of personal data to a non-EEA country if such transfer will occur
8. Period for which personal data will be stored, or if no period can be decided, then the criteria used to determine that period

9. Rights of the data subject
10. Provided that the processing is based upon “consent”, the right to withdraw consent at any time (However there is no effect on the processing which took place prior to the withdrawal of consent.)
11. Right to lodge complaints with the supervisory authority
12. From which source the personal data originates, and if applicable, whether it came from publicly accessible sources
13. Whether or not profiling will be performed, and if it will be, an overview of the profiling method

The form used to request collection of personal data shall be the Application Form for Personal Data Collection (Appendix 2) which is submitted to the Data Privacy Co-Ordinator for approval.

Collection of Special Categories of Personal Data

When collecting any special category of personal data directly from the data subjects using documents (including electronic and magnetic media), the fact that special category of personal data will be collected must be stated in the document, and explicit consent must be obtained except for cases detailed later in these procedures

If means other than that described in the preceding paragraph are used to collect personal data, the specific method of obtaining consent shall be decided separately.

Registry for Records of Processing Activities of Personal Data

The form prescribed by the Procedures to record all processing activities of personal data shall be the Registry for Records of Processing Activities of Personal Data (Appendix 3)

Providing Personal Data to an Outside Organization

The form prescribed by the Procedures to request transfer of data to an outside organisation shall be the Request Form and Record Sheet for Provision of Personal Data to Outside Organizations (Appendix 4) which is submitted to the Data Privacy Co-Ordinator for approval.

Selection of Data Processors

When selecting a processor, submit a request via the Processor Selection Check sheet (Appendix 5).

The Data Protection Officer will review the request and shall appropriately investigate its contents.

Supervision of Data Processors

Processors shall be required to submit the Personal Data Processor Control Checklist (Appendix 6) a minimum of once a year.

In addition, other necessary measures for supervision shall be carried out as needed.

Response to Requests from Data Subjects

Requests for disclosure, correction etc., or requests for discontinuation of use etc., from the data subjects shall be received via email by means of the Request Form for Personal Data Disclosure, Correction, and Discontinuation of Use Etc. (Appendix 7). However this method shall not necessarily apply when lodging complaints. When the Global Privacy Office receives this request form, it shall immediately notify the Data Protection Coordinator of the division concerned.

The response to a request for disclosure shall be sent by the Data Protection Coordinator to the requesting data subject by means of the Response Form for Personal Data Disclosure Etc. Request (Appendix 8).

Regardless of the provisions of the preceding two paragraphs, for members of a service which involves assigning member IDs and passwords, the member ID, password and other items that can be used to identify the data subject shall be received, and responses shall be sent by email or similar means.

Personal data shall not be disclosed, and the Data Protection Coordinator shall send the reason for not disclosing the personal data to the requester by means of the Response Form for Personal Data Disclosure Etc. Request (Appendix 8) to the requesting data subject.

1. When the address listed in the request form, the address listed in the document provided for identity verification, and the address listed in the requester's personal data that is processed by the Company do not match, or in other cases when identity verification is not possible
2. When the request is made by a representative but the mandate for the representation cannot be verified
3. When the designated request form was not completed correctly
4. When the data for which disclosure was requested is not classified as personal data
5. When there is the risk of harm to the life, health, property, or other rights or interests of the data subject or a third party
6. When there is the risk of significant impairment of the proper conduct of the Company's operations
7. When doing so would violate other laws or regulations

If the Data Protection Coordinator performed correction etc. or discontinuation of use etc. based on the request for correction etc. or request for discontinuation of use etc., then the Data Protection Coordinator shall provide notice of that fact by means of the Response Form for Personal Data Disclosure Etc. Request (Appendix 8)

If the Data Protection Coordinator decided not to perform correction etc. or discontinuation of use etc., he/she shall notify the data subject that such measures will not be taken and explain the reason for the decision by means of the Response Form for Personal Data Disclosure Etc. Request (Appendix 8).

Procedures for Responding to Other Rights Based on EU Laws and Regulations

Requests based on the right not to be subject to a decision based solely on automated processing, right to object, and right to data portability, and requests for withdrawal of consent shall in general be received via email by means of the Personal Data Rights Request Form (Appendix 9). However this method shall not necessarily apply when lodging complaints. When the Global Privacy Office receives this request form, it shall immediately notify the Data Protection Coordinator of the division concerned.

When the Data Protection Coordinator took action based on the request, he/she shall provide notification of that fact by means of the Response Form for Personal Data Disclosure Etc. Request (Appendix 8). When responding to a portability request, the data shall be provided in the requested format.

If the Data Protection Coordinator decided not to perform correction etc. or discontinuation of use etc., he/she shall notify the data subject that such measures will not be taken and explain the reason for the decision by means of the Response Form for Personal Data Disclosure Etc. Request (Appendix 8).

Status of this policy

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

These procedures shall be established on May 25, 2018 and shall take effect on the same date.

Any questions regarding the interpretation or operation of these procedures shall be resolved by the Global Data Protection Officer.

Appendices

The documents used in these procedures are the following, and a sample of each is attached.

Appendix 1 - Decision to carry out a Data Protection Impact Assessment Checklist

Appendix 2 - Application Form for Personal Data Collection

Appendix 3 - Registry for Records of Processing Activities of Personal Data

Appendix 4 - Application Form for Providing Personal Data to an Outside Organization

Appendix 5 - Processor Selection Check sheet

Appendix 6 - Personal Data Processor Control Checklist

Appendix 7 - Request Form for Personal Data Disclosure, Correction, and Discontinuation of Use Etc

Appendix 8 - Response Form for Personal Data Disclosure Etc. Request

Appendix 9 - Personal Data Rights Request Form



Decision to carry out a Data Protection Impact Assessment Checklist

Date:	
Requested by:	
Description of action:	E.G. Holding exhibition, conducting questionnaire survey
Personal Data Items:	E.G. Name, address, telephone number

Please answer the following questions:

Is there an evaluation (scoring) of the data subject using personal data?	Yes / No
Are the contract contents determined by automated decision-making based on personal data?	Yes / No
Are the subject individuals be monitored by a system?	Yes / No
Is a special category of personal data processed?	Yes / No
Is personal data processed on a large scale?	Yes / No
Is personal data that was collected for a different purpose matched or combined and used?	Yes / No
Is personal data from vulnerable data subjects processed?	Yes / No
Is personal data processed for innovative use or applying technological or organisational solutions?	Yes / No
Is availability of services decided based on personal data?	Yes / No

Number of Yes responses:

1 or fewer → Data protection impact assessment is not necessary.

2 or more → Data protection impact assessment is necessary.

Decision	Implemented By



Application Form for Personal Data Collection

Date:	
Requested by:	
Description of action:	E.G. Holding exhibition, conducting questionnaire survey
Personal Data Items:	E.G. Name, address, telephone number

Is Special Category of personal data required?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Collection lawfulness	<input type="checkbox"/> There is record of data subject consent. <input type="checkbox"/> Meets requirements for exception. <input type="checkbox"/> Neither of the above → Collection not permitted.
Transfer to Non-EEA Countries	<input type="checkbox"/> None <input type="checkbox"/> Transfer planned → Proceed to next check item
Check of lawfulness of transferring to Non-EEA Countries (if any)	<input type="checkbox"/> Collection by the company is pursuant to on record consent <input type="checkbox"/> SCC was concluded. <input type="checkbox"/> Meets requirements for exception prescribed <input type="checkbox"/> None of the above → Collection not permitted
Purpose of use	
Method of collection	
Method of notifying data subject of purpose of use	
Transfer to outside organization or other division	<input type="checkbox"/> No transfer <input type="checkbox"/> Provided to outside organization. → Perform request for transfer. <input type="checkbox"/> Provided to other division. → Provide instructions for processing to receiving division
Entry in Registry	<input type="checkbox"/> Entry completed <input type="checkbox"/> Not entered → Processing not permitted
Need to carry out data protection impact assessment	<input type="checkbox"/> Necessary → Attach decision checklist and DPIA results. <input type="checkbox"/> Not necessary → Attach decision checklist. <input type="checkbox"/> Not decided → Processing not permitted
Person responsible for processing of collected personal data	* Designated by Data Protection Responsible.
Person using collected personal data	
Storing	(Location)
	(Format) <input type="checkbox"/> Paper media <input type="checkbox"/> Electronic media
	(Period)
Collection	

Security Safeguards	Storage	
	Use	
	Destruction	

Decision	Implemented By

Distribute to the following after approval: Requesting party, Data Protection Coordinator (original)



Request Form and Record Sheet for Provision of Personal Data to Outside Organizations

Date:	
Requested by:	
Description of action:	
Personal Data Items:	

Purpose of use	
Method of transfer	
Transfer to non-EEA countries	<input type="checkbox"/> None <input type="checkbox"/> Transfer planned → Proceed to next check item
Check of lawfulness of transferring to Non-EEA Countries (if any)	<input type="checkbox"/> There is record of consent for transfer to recipient. <input type="checkbox"/> SCC has been concluded with recipient. <input type="checkbox"/> Meets requirements for exception <input type="checkbox"/> None of the above → transfer not permitted
Manner of transfer	<input type="checkbox"/> Outsourcing → Perform processor selection check using Appendix XX <input type="checkbox"/> Joint control → Check distribution of responsibilities <input type="checkbox"/> Other () → Consult with Office.
Recipient	Name: Representative name if recipient is corporation: Address:
Person responsible for transfer of personal data	* Designated by the Data Protection Responsible.
Person transferring personal data	
Storing	(Location)
	(Format) <input type="checkbox"/> Paper media <input type="checkbox"/> Electronic media
	(Period)
Security Safeguards	Collection
	Storage
	Use
	Destruction

Decision	Implemented By

Distribute to the following after approval: Requesting party, Data Protection Coordinator (original)



Processor Selection Checklist

Date:	
Requested by:	
Company name	
Company Address	

Was agreement to protect the confidentiality of personal data obtained (at time of contract)?	Yes / No
Were there any incidents of data leakage in the past?	Yes / No
Is instruction concerning confidentiality of contracted data provided to employees?	Yes / No
Was a request delivered to conduct instruction and ensure understanding of what personal data is?	Yes / No
Was a request delivered to provide instruction about the importance of personal data to employees?	Yes / No
Is instruction provided to employees regarding the effects of personal data leakage?	Yes / No
Did the processor agree to obtain permission before subcontracting?	Yes / No
Did the processor agree to return or delete all data when the contract ends?	Yes / No
Did the processor agree to accept appropriate liability in the event of an incident caused by a fault at the processor?	Yes / No
Does any of the following apply? 1) The consent of the data subject is obtained regarding provision of personal data to the processor.	Yes / No
2) The contracted processor is located in a country on which the EU Commission issued an adequacy decision	Yes / No
3) An agreement (SCC) has been concluded between the processor and the Global Data Protection Officer.	Yes / No

[Selection standard] The processor intends to improve any “No” responses to the “Yes” level.

[Selection result] (Can be selected / Cannot be selected)

Date:

Data Protection Responsible

(File this sheet together with the contract concluded with the processor.)



Personal Data Processor Control Checklist

Date:	
Requested by:	
Company name	
Company Address	

Is a data security plan and personal data protection plan formulated, maintained and implemented?	Yes / No
Are security-related training and training for personal data protection and confidentiality conducted regularly for persons responsible for processing the contracted data? Are there records of conducting the training?	Yes / No
Is there no unauthorized subcontracting?	Yes / No
Are the same obligations imposed on any subcontractors?	Yes / No
Is the storage location for the contracted data appropriate?	Yes / No
Are no unauthorized copies made of contracted data?	Yes / No
Is there no use of contracted data for purposes other than the designated purpose, no provision or contracting of it to outside organizations, no removal of it from the ordinary location of use, and no sending or other leakage of contracted data to the outside?	Yes / No
Is contracted data not output for any purpose except for the operational purpose clearly informed?	Yes / No
Is contracted data not processed by persons other than those authorized?	Yes / No
Is destruction of contracted data performed correctly in the presence of the person responsible?	Yes / No
Is contracted data in electronic form not stored anywhere except for the designated database?	Yes / No
Is access to the contracted data database properly controlled?	Yes / No
Is there a system for communicating the necessary information without delay in the event of an incident, or when inquiries are received from the data subjects, or when data protection impact assessments are carried out?	Yes / No

(File this sheet together with the contract concluded with the processor.)



Request Form for Personal Data Disclosure, Correction, Discontinuation of Use, Etc.

An individual who would like to request the disclosure, correction etc. or discontinuation of use etc. of personal data should complete the necessary items in the spaces below, attach one copy of an identity verification document, and send it to the J & E Hall Data Privacy Co-Ordinator or to the Global Privacy Office listed below.

Daikin Industries, Ltd. Umeda Center Bldg., 2-4-12, Nakazaki-Nishi, Kita-ku, Osaka 530-8323, Japan

1. Details of request

Request for	<input type="checkbox"/> Disclosure <input type="checkbox"/> Correction, addition, erasure <input type="checkbox"/> Discontinuation of use, erasure	
Items and data for correction, addition, erasure	Before correction	After correction or addition
Reason for requesting discontinuation of use or erasure		

2. Information needed to identify the customer's personal data processed by our company

Name	
Address	1) Home 2) Place of work (place of work name, affiliation:)
Telephone	
Conditions by which our company collected your personal data	(Enter the product or service of our company which you are using, or the situation in which our company collected your personal data. Please enter in as much detail as possible.)

3. Identity verification document

1) Driver's license 2) Passport 3) Other ()
(Select one and attach a copy to this request form.)

* Personal data collected from this request form will be used for processing the request.



Response Form for Personal Data Disclosure Etc. Request

Following is the response to your request related to personal data that was received on _____.

Date:	
Response by:	
Details of request	
Response	

J & E Hall International
Questor House, 191 Hawley Road, Dartford, Kent, DA1 1PU

Please direct any inquiries concerning the response to the above person in charge.



Personal Data Rights Request Form

Individuals wishing to assert their right to object or right not to be subject to a decision based solely on automated processing based on EU law, or who would like to request personal data portability or to withdraw consent, should complete the necessary items in the spaces below, attach **one copy of an identity verification document**, and send it to the J & E Hall Data Privacy Co-Ordinator or to the Global Privacy Office listed below.

Daikin Industries, Ltd. Umeda Center Bldg., 2-4-12, Nakazaki-Nishi, Kita-ku, Osaka 530-8323, Japan

1. Details of request

Request contents	<input type="checkbox"/> Right not to be subject to a decision based solely on automated processing <input type="checkbox"/> Right to object <input type="checkbox"/> Portability <input type="checkbox"/> Withdrawal of consent
Portability format	

2. Information needed to identify the customer's personal data processed by our company

Name	
Address	1) Home 2) Place of work (place of work name, affiliation:)
Telephone	
Conditions by which our company collected your personal data	(Enter the product or service of our company which you are using, or the situation in which our company collected your personal data. Please enter in as much detail as possible.)

3. Identity verification document

1) Driver's license 2) Passport 3) Other () (Select one and attach a copy to this request form.)

* Personal data collected from this request form will be used for processing the request.