Data Handling Policy

MAY 2026

Lothian

Contents

1. Scope & Purpose

1.1 This policy outlines the procedures and guidelines for the secure storage, handling, use, retention, and disposal of disclosure information within Lothian Buses.

1.2 This policy applies to all employees, contractors, consultants, and third-party entities that have access to disclosure information in any form, including electronic, paper, or verbal communication.

2. Definitions

2.1 **Disclosure information** refers to any sensitive data, including but not limited to personal information, financial records, trade secrets, and proprietary information, obtained or generated during the course of business activities.

3. Responsibilities

3.1 Management is responsible for ensuring that appropriate measures are in place to safeguard disclosure information and for providing necessary resources to implement and maintain compliance with this policy.

3.2 All employees are responsible for adhering to the guidelines outlined in this policy, including proper handling, storage, and disposal of disclosure information.

4. Procedure

4.1 Secure Storage

4.1.1 Disclosure information must be stored in secure locations accessible only to authorised personnel.

4.1.2 Physical documents containing disclosure information must be kept in locked cabinets or secure rooms when not in use.

4.1.3 Electronic disclosure information must be stored on secure servers with restricted access.

4.1.4 Access to disclosure information must be granted on a need-to-know basis.

4.2 Handling

4.2.1 Disclosure information should only be accessed by authorised personnel for legitimate business purposes.

4.2.2 Employees must not share disclosure information with unauthorised individuals or entities.

4.2.3 When disclosing information to third parties, employees must ensure that appropriate confidentiality agreements are in place. For guidance on these agreements, please contact the Data Protection Officer (DPO).

4.3 Use of Disclosure Information

4.3.1 Disclosure information should only be used for the purpose for which it was obtained.

4.3.2 Employees must follow company policies and procedures when accessing or using disclosure information.

4.3.3 Any unauthorised use of disclosure information is strictly prohibited.

4.4 Data Retention

4.4.1 Disclosure information should only be retained for as long as necessary to fulfil its intended purpose or as required by law.

4.4.2 Once disclosure information is no longer needed, it must be securely disposed of in accordance with the procedures outlined in section 4.5.

4.5 Data Disposal

4.5.1 Physical documents containing disclosure information must be shredded or destroyed using secure methods to prevent unauthorised access.

4.5.2 Electronic disclosure information must be permanently deleted from all storage devices.

4.5.3 Employees must follow the company's document retention and disposal schedule to ensure compliance with legal and regulatory requirements.

4.6 Training and Awareness

4.6.1 All employees must receive training on the importance of safeguarding disclosure information and the procedures outlined in this policy.

4.62. Regular awareness campaigns and updates should be conducted to reinforce the importance of compliance with this policy.

5. Breach of this Policy

5.1 Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or legal action.

5.2 Any suspected violations of this policy should be reported to the appropriate authorities for investigation.

6. Review and Revision

6.1 This policy will be reviewed annually or as needed to ensure its effectiveness, relevance, and compliance with regulatory requirements. Amendments to the policy may be proposed based on feedback, changes in technology, or organisational needs.

7. Version Control

This policy will be maintained and updated by the IT Department. Any revisions to the policy will be documented, communicated to relevant stakeholders, and archived for reference purposes.

Version No.	Date of Change	Change Author	Key Amendments	Review Date
v1.0	DD/MM/YYYY	Nick Connor	Published	May 25
V2.0	15/05/2025	Nick Connor	Published	May 2026
V3.0	01/05/2026	Nick Connor	Reviewed & Published	May 2027