



GENERAL DATA PROTECTION POLICY (GDPR)

We hold personal data about our employees, clients, suppliers and other individuals for a variety of business purposes.

This policy sets out how we seek to protect that data and ensure that staff understand the rules governing their use of personal data to which they have access in the course of their work.

In particular, this policy requires staff to ensure that the Data Protection Officer (DPO) be consulted before any significant new data processing activity is initiated to ensure that relevant compliance steps are addressed.

Scope

This policy applies to all staff who must be familiar with this policy and comply with its terms. This policy supplements our other policies relating to internet and email use.

Responsibility

The Financial Controller is effectively our Data Protection Officer, and has overall responsibility for the day-to-day implementation of this policy.

Our procedures

Fair and lawful processing

We must process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we should not process personal data unless the individual whose details we are processing has consented to this happening.

The Data Protection Officer's responsibilities:

- Keeping the board updated about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and policies on a regular basis
- Arranging data protection training and advice for all staff members and those included in this policy
- Answering questions on data protection from staff, board members and other stakeholders
- Responding to individuals such as clients and employees who wish to know which data is being held on them by us
- Checking and approving with third parties that handle the company's data and contracts or agreements regarding data processing
- Approving data protection statements attached to emails

This is supported re IT as follows...

- Ensure all systems, services, software and equipment meet acceptable security standards
- Checking and scanning security hardware and software regularly to ensure it is functioning properly
- Researching third-party services, such as cloud services the company is considering using to store or process data

Responsibilities of the Sales & Marketing Management

- Approving data protection statements attached to other marketing copy
- Addressing data protection queries from clients, target audiences or media outlets
- Coordinating with the DPO to ensure all marketing initiatives adhere to data protection laws and the company's Data Protection Policy

The processing of all data must be:

- Necessary to deliver our services
- In our legitimate interests and not unduly prejudice the individual's privacy
- In most cases this provision will apply to routine business data processing activities.

Sensitive personal data [Co. Staff primarily only]

In most cases where we process sensitive personal data we will require the data subject's *explicit* consent to do this unless exceptional circumstances apply or we are required to do this by law (e.g. to comply with legal obligations to ensure health and safety at work). Any such consent will need to clearly identify what the relevant data is, why it is being processed and to whom it will be disclosed.

Accuracy and relevance

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If they believe that information is inaccurate we will record the fact that the accuracy of the information is disputed and inform the DPO.

Personal data

We will take all reasonable steps to ensure that personal data we hold is accurate and updated as required.

Data security

All applicable staff must keep personal data secure against loss or misuse. Where other organisations process personal data as a service on our behalf, the DPO will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third party organisations.

Storing data securely

- In cases when data is stored on printed paper, it should be kept in a secure place where unauthorised personnel cannot access it
- Printed data should be securely shredded when it is no longer needed

- Data stored on a computer should be protected by strong passwords that are changed regularly. We encourage all staff to use a password manager to create and store their passwords.
- Data stored on CDs or memory sticks must be locked away securely when they are not being used.
- The DPO must approve any cloud used to store data
- Servers containing personal data must be kept in a secure location, away from general office space.
- Data should be regularly backed up in line with the company's backup procedures.
- Data should never be saved directly to mobile devices such as laptops, tablets or smartphones
- All servers containing sensitive data must be approved and protected by security software and strong firewall.

Data retention

We must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but should be determined in a manner consistent with our data retention guidelines.

Transferring data internationally = N/A to us

Subject access requests

Please note that under GDPR, individuals are entitled to request access to information held about them.

If we do receive a subject access request, it will be referred immediately to the DPO.

Staff should contact the Data Protection Officer if they would like to correct or request information that we hold about you. Involved specifics will be provided within 1 calendar month.

Processing data in accordance with the individual's rights

We will abide by any request from an individual not to use their personal data for direct marketing purposes and notify the DPO about any such request.

We do not send direct marketing material to someone electronically (e.g. via email) unless we have an existing business relationship with them in relation to the services being marketed.

The DPO should be consulted for advice on direct marketing before starting any new direct marketing activity.

Training

All staff will receive training on this policy. New joiners will receive training as part of the induction process. Further training will be provided at least every two years or whenever there is a substantial change in the law or our policy and procedure.

Training is provided in-house on a regular basis.

It will cover:

- The law relating to data protection
- Our data protection and related policies and procedures.

Completion of training is compulsory.

GDPR provisions

Where not specified previously in this policy, the following provisions will be in effect on or before 25 May 2018.

Privacy Notice - transparency of data protection

Being transparent and providing accessible information to individuals about how we will use their personal data is important for our organisation. We have a process that details on how we collect data and what we will do with it for any persons interested.

Conditions for processing

We will ensure any use of personal data is justified using at least one of the conditions for processing and this will be specifically documented. All staff who are responsible for processing personal data will be aware of the conditions for processing. The conditions for processing will be available to data subjects in the form of a privacy notice.

Justification for personal data

We will process personal data in compliance with all 'relevant' six data protection principles. We will document the additional justification for the processing of sensitive data, and will ensure any biometric and genetic data is considered sensitive.

Consent

The data that we collect is subject to active consent by the data subject. This consent can be revoked at any time.

Criminal record checks

Any criminal record checks conducted as part of security screening are justified by law. Criminal record checks cannot be undertaken based solely on the consent of the subject.

Data portability

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be done for free.

Right to be forgotten

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

Privacy by design and default

Privacy by design is an approach to projects that promote privacy and data protection compliance from the start. The DPO will be responsible for conducting Privacy Impact Assessments and ensuring that all IT projects commence with a privacy plan.

When relevant, and when it does not have a negative impact on the data subject, privacy settings will be set to the most private by default.

Reporting breaches

All members of staff have an obligation to report actual or potential data protection compliance failures. This will be handled as an Internal N/C. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the ICO of any compliance failures that are material either in their own right or as part of a pattern of failures

Monitoring

Everyone must observe this policy. The DPO has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.

Consequences of failing to comply

We take compliance with this policy very seriously. Failure to comply puts both you and the organisation at risk. The importance of this policy means that failure to comply with any requirement may lead to disciplinary action under our procedures which may result in dismissal. If you have any questions or concerns about anything in this policy, do not hesitate to contact the DPO.