

## **Data Protection Policy**

The Group needs to keep certain information about its employees, customers, and suppliers for financial and commercial reasons and to enable us to monitor performance, to ensure legal compliance and for health and safety purposes.

This policy sets out how we seek to protect personal 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 Co-ordinator be consulted before any significant new data processing activity is initiated to ensure that relevant compliance steps are addressed.

### **Data Protection Co-ordinator**

To ensure the implementation of this policy the Group has designated Liz Friar as Data Protection Co-ordinator. All enquiries relating to the holding of personal data should be referred to them in the first instance.

### **Employee Responsibilities**



Key Information for you need to know:

- keep passwords secure, change them regularly and do not share your passwords with anyone in line with the Group's Password Policy;
- lock / log off computers when you away from your desk;
- position computer screens away from windows to prevent accidental disclosures of personal information;
- speak to IT to ensure that any personal information that is being taken out the office is correctly encrypted;
- prevent virus attacks by taking care when you open emails and attachments or visit new websites;
- dispose of confidential paper waste securely by shredding or using the secure waste disposal bags available to be collected by the Group's approved waste disposal contractor;
- work on a "clear desk" basis by securely storing hard copy personal information when it is not being used;
- ensure visitors are signed in and out of the premises and accompanied where relevant in areas normally restricted to staff;

You also need to know:

- that our ICT systems are monitored including emails, website access and computer files on the server;
- to collect only the personal information you need for a particular business purpose;
- to update records promptly, for example changes of address, marketing preferences;
- to delete personal information the business no longer requires;
- that you can be prosecuted if you deliberately give out personal details without permission. Be wary of people who may try and trick you into giving out personal details. Identity checks should be carried out before disclosing personal information to either someone making an incoming call or when making outgoing calls. Also limited personal information must be given over the telephone and follow up with written confirmation if necessary.
- items which are marked "Personal" or "Private and Confidential", or which appear to be of a personal nature, are opened by the addressee only.

As an employee you are responsible for:

- checking that any information that you provide in connection with your employment is accurate and up-to-date;
- notifying the Group of any changes to information you have provided, for example changes of address;
- ensuring that you are familiar with and follow the Data Protection Policy.

If you use the Group's office address for matters that are not work-related, the Group cannot be responsible for the confidentiality of such items.

Any breach of the Data Protection Policy, either deliberate or through negligence, may lead to disciplinary action being taken and could in some cases result in a criminal prosecution.

### **Training**

Managers must ensure staff are trained to comply with Data Protection and relevant legislation surrounding it so they know what is expected of them. Training must be applicable to the roles and responsibilities the individual holds and training records must be kept.

### **Sensitive Personal Data**

In most cases where the Group processes sensitive personal data they 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**

The Group will ensure that any personal data they process is done lawfully, fairly and transparently.

The data collected on a subject should be adequate, relevant and limited to what is necessary in relation to the purposes for which it is being collected.

Personal data shall be accurate, where necessary kept up to date, and kept only for the period of time required to complete the processing task for which it is obtained.

Individuals may ask that the Group correct inaccurate personal data relating to them. If you believe that information held is inaccurate you should record the fact that the accuracy of the information is disputed and inform the Data Protection Co-ordinator in writing.

### **Access to Personal Data**

Access to all personal data is restricted to limited staff.

Employment checks are carried out on personnel as applicable to their role and / or the service they are delivering. Employees will obtain Disclosure Barring Service checks and complete relevant security clearances as required.

### **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. A request for data erasure must be made to the Data Protection Co-ordinator who will assess the request in line with the current ICO guidelines, legislative requirements and business need.

### **Data Audit and Register**

Regular data audits to manage and mitigate risks will inform the Group's data register. This contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

### **IT Security**

Personal data stored electronically will be protected by the Group's security policies and processes. The Group operates a Computer and Telephone Usage Policy which includes details on acceptable use, password security and creation and obligations towards reporting breaches of data.

Access to all systems are restricted to limited employees as required for the application of their job role.

Only Group issued USB drives must be used by the Group's employees. All third-party USB drives must be checked by the IT department before they are used in our Group systems.

Our business continuity arrangements identify how we will protect and recover the personal information we hold.

### **Transferring Data Internationally**

There are restrictions on international transfers of personal data. You must not transfer personal data anywhere outside the EEA without first consulting the Data Protection Co-ordinator.

### **Reporting Breaches**

All members of staff have an obligation to report actual or potential data protection compliance failures. 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

Any breach of the Data Protection Policy, either deliberate or through negligence, may lead to disciplinary action being taken and could in some cases result in a criminal prosecution.

### **Third Party Access to The Group ICT Systems**

With the exception of our primary IT support partner access to the Group systems is restricted and can only be accessed as agreed with the System Administrator.

All third-party providers are bound by confidentiality and security clauses within the service level agreements agreed.

### **Subject Access Requests**

You are entitled to know what personal information the Group holds about you, why it is being held and who the Group discloses your information to.

All Subject Access Requests must be referred to the HR Manager in the first instance.

All Subject Access Requests will be dealt with in accordance with the current ICO Code of Practice on Subject Access.

### **Storage of Data**

Hard copy personal data, whether related to our employees, suppliers or customers, is held in secure cabinets with access restricted to limited staff. This personal data is not routinely carried in transit, however where it is required to be transported it will be held in secure containers.

Electronic personal information held locally will be held with restricted access to limited staff. This will be password controlled via the Network Login. This personal data is not routinely carried in transit, however where it is required to be transported it will be held on encrypted USB drives.

Obsolete and unused IT equipment is stored in a secure cabinet with access restricted to limited personnel.

### **Retention of Records and Data**

For some records and data there are statutory retention periods with statutory authorities. For other records there are no statutory retention periods, however there are either recommended retention periods, or retention periods required by third party organisations.

The Group will retain records in accordance with the relevant authorities' recommendations and guidelines.

### **Disposal of Data**

All hard copy personal data and IT equipment including hard drives are disposed of in a secure manner by an approved waste disposal contractor and relevant waste transfer notes obtained.

All hard copy personal data is either securely shredded on-site or disposed of off-site via secured facilities. Hard drives are shredded at an off-site facility.

Electronic data is removed from our systems either through deletion or, if required, archiving. All archived records are securely stored with limited access.

## Marketing

Clients may be contacted for marketing purposes. No marketing materials may be emailed to any other individuals or companies without prior permission of the recipient.

Managers should check our compliance with legal obligations such as copyright or licensing requirements when downloading or copying information, and when publishing documents.

Craig Macklin

A handwritten signature in black ink, appearing to read 'Craig Macklin', with a stylized, cursive script.

Franki Foundations UK Group Managing Director

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