

## DATA PROTECTION POLICY AND PROCEDURES

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Our activity involves the collection of personal data and may involve the collection of sensitive personal data.

Data for the purposes of our products and services includes:

- Customer personal information
- Customer transactional data and
- Special categories of data.

We only store and processes data in accordance with the data protection principles contained in the General Data Protection Regulation (GDPR), and in accordance with the Data Protection Act 2018 (DPA) and the Privacy and Electronic Communication Regulations (PECR).

Principles relating to processing of personal data

Personal data shall be;

- processed lawfully, fairly and in a transparent manner in relation to the individual ('lawfulness, fairness and transparency')
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation')
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
- accurate and, where necessary, kept up to date; ('accuracy')
- kept in a form which permits identification of individuals for no longer than is necessary ('storage limitation')
- processed in a manner that ensures appropriate security of the personal data ('integrity and confidentiality')



- Demonstration of Compliance (“accountability”)

We will retain successful applicants’ information by way of archiving and encryption within our bespoke CRM system.

We will delete personal data which is not necessary to hold (such as additional supporting documents) once an application has been completed. We will hold transaction and contact information for the purposes of complaints and this will be securely deleted after a period of three years.

Data is retained in connection with our products and services for a period of three months in the case of individuals who have engaged with us but have not become customers. If we are unable for any reason to provide an exact timescale for data retention of particular information, we will provide a framework of the criteria used to determine this period.

Some of our responsibilities under these laws include:

- To notify the Information Commissioner we are processing information (registration)
- Process the personal information in accordance with the Principles relating to processing of personal data
- To answer information requests received from individuals
- Ensuring that the people whose information we hold, know that we have it and that they are likely to understand what it will be used for
- Ensuring that access to personal information is limited to those on a strictly need to know basis
- Ensuring that personal information is accurate and up to date
- Ensuring that personal information is deleted or destroyed as soon as there is no further need for it

- Ensuring that all employees are trained in their duties and responsibilities under the GDPR & DPA, and assess whether they are putting them into practice
- Ensuring that any notifiable breach is reported to the Information Commissioner's Office within 72 hours
- Ensuring that if we have a legitimate reason for recording calls e.g. for staff training purposes and that people are made aware of this
- For being aware that the Act provides individuals with important rights, including the right to find out what personal information is held on electronic and most paper records
- Ensuring that third party information is removed from computer records before being disclosed
- Ensuring that manual records which are contained within a "relevant filing system" can be disclosed a part of an access request
- Keeping our Data Security Policy relevant and up to date.

There is stronger legal protection for more special categories information which relates to information including:

Racial or ethnic background, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sexual life.

#### CLIENT COMMUNICATION

We communicate with individuals in a concise, transparent, intelligible and easily accessible form, using clear and plain language. Our firm supports the notion of accountability and transparency that are introduced by the GDPR. We will always endeavour to engage our clients with truthfulness and provide full information where we are able to do so. It is our clients who drive the success of our business, and we will handle all personal data with the upmost integrity.



## POLICIES & PROCEDURES.

### NEW PROJECTS AND PROCEDURES

Check DBS - Privacy Impact Assessments Policy and Procedure

### BREACHES & INCIDENTS

Check DBS Breach-Report-Policy-and-Procedure

Data Breach Log

### CONSENT

Check DBS - Understanding Consent Policy

### DATA RETENTION

Check DBS - Retention Policy and Procedure

Data Retention Table

Retention Table Check DBS

### INFORMATION RIGHTS

Check DBS - Data Subject Rights Policy and Procedure

Check DBS - Suppression Request Handling Policy and Procedure



Check DBS - Data Rectification Policy

Check DBS - Data Portability Policy