



DATA PROTECTION POLICY

The organisation needs to collect and use certain types of information about staff, clients and other individuals who come into contact with the company in order to operate. In addition, it may be required by law to collect and use certain types of information to comply with statutory obligations of Local Authorities, government agencies and other bodies.

This personal information must be dealt with properly, however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material - and there are safeguards to ensure this is within the EU General Data Protection Regulation and the Data Protection Act 2018, Secure Data Management is committed to keeping all personal information secure and to comply with any and all relevant UK and EU legislation relating to Data Protection, this will continue to be the case after the UK leaves the EU on the 31st December 2020.

We regard the lawful and correct treatment of personal information as very important to successful operations, and to maintaining confidence between those with whom we deal and ourselves. We ensure that our Organisation treats personal information lawfully and correctly.

Most businesses hold personal data on their customers, employees and partners. The explosion in the use of the Internet, electronic communication and computerisation of business data has led to an increase in the importance of privacy. Breaches of computerised data security have prompted the introduction of legislation on a national and European level.

These include:

- Human Rights Act 1998
- Freedom of Information Act 2000
- Privacy and Electronic Communications Regulations 2003
- Regulation of Investigatory Powers Act 2000
- Telecommunications (Lawful Business Practice) Interception of Communications Regulations 2000
- Data Protection Act 2018
- Computer Misuse Act 1990
- European Union General Data Protection Regulation 2016 (EU GDPR)

The General Data Protection Regulation 2016 replaced the EU Data Protection Directive of 1995 and superseded the laws of individual Member States that were developed in compliance with the Data Protection Directive 95/46/EC. Its purpose was to protect the “rights and freedoms” of living individuals, and to ensure that personal data is not processed without their knowledge, and, wherever possible, that it is processed with their consent.

The top management of Secure Data Management Ltd are strongly committed to the rights of individuals whose data they collect and process and will comply with UK and EU laws related to personal information in-line with the EU General Data Protection Regulation (GDPR) and any data protection laws substantially amending, replacing or superseding the GDPR following any exit by the United Kingdom from the EU (including in the event of a “no deal Brexit scenario”)

As a Data Processor, Secure Data Management Ltd, shall, in relation to the personal information (as that term is defined under the GDPR) of the Data Controller (the Client), continue to comply with applicable privacy and data protection laws, including Regulation (EU) 2016/679 (“GDPR”), any United Kingdom law implementing the GDPR and any data protection



DATA PROTECTION POLICY (continued)

laws substantially amending, replacing or superseding the GDPR following any exit by the United Kingdom from the EU (including in the event of a “no deal Brexit scenario”)

Where Secure Data Management Ltd are the Data Controller (regards internal data and the data held for its staff members) they shall, in relation to that personal information (as that term is defined under the GDPR) to comply with applicable privacy and data protection laws, including Regulation (EU) 2016/679 (“GDPR”), any United Kingdom law implementing the GDPR and any data protection laws substantially amending, replacing or superseding the GDPR following any exit by the United Kingdom from the EU (including in the event of a “no deal Brexit scenario”)

The top management of Secure Data Management Ltd ensures that it meet its requirements under EU GDPR and any data protection laws substantially amending, replacing or superseding the GDPR following any exit by the United Kingdom from the EU (including in the event of a “no deal Brexit scenario”) in relation to the security and management of personal information, that the objectives of Secure Data Management Ltd and obligations under the law are met, and ensures that controls are in place that reflect the level of risk that Secure Data Management Ltd is willing to accept.

In addition, steps are taken to ensure that Secure Data Management Ltd is able to meet all the regulatory, statutory and contractual obligations that are applicable, including the protection of the interests of individuals and all other relevant stakeholders.

Therefore, for the further purposes of this policy, the aforementioned Regulations (both current and future UK domestic and current GDPR) will be stated as **Relevant EU and UK Data Protection Regulation**.

To comply with the requirements of relevant EU and UK Data Protection Regulation, Secure Data Management Ltd will:

- Process personal information only where this is strictly necessary for legitimate organisational purposes
- Collect only the minimum personal information required for these purposes and not process excessive amounts of personal information
- Provide clear information to individuals about how their personal information will be used and who will be using the information
- Only process relevant and adequate personal information
- Process personal information fairly and lawfully
- Keep all personal information secure
- Maintain an inventory of the categories of personal information that is processed
- Ensure they keep personal information accurate and up to date
- Retain personal information only for as long as is necessary for legal or regulatory reasons or, for legitimate organisational purposes
- Respect individuals’ rights in relation to their personal information as defined in the GDPR / relevant EU and UK Data Protection Regulation.
- Only transfer personal information outside the EU Member States in circumstances where it can be adequately protected and aligned with EU GDPR / relevant EU and UK Data Protection Regulations
- Only apply exemptions permitted by data protection legislation



DATA PROTECTION POLICY (continued)

- Identify internal and external stakeholders and the degree to which these stakeholders are involved in the governance of Secure Data Management Ltd's stored or processed personal information
- Identify staff with specific responsibility and accountability for the ongoing maintenance and support of the requirements of the GDPR / relevant EU and UK Data Protection Regulation.

- The Data Processor has appointed an individual (UK Data Protection Officer) who is responsible for all matters related to Data Security and Processing and who will supply copies of the Data Processing Agreement (DPA), the SDM Data Protection Policy and any other related external policies related to Data Security to the Data Controller on demand.

- UK Data Protection Contact Details: -

Name: Nicola Peters

Position: Quality and Compliance Manager

Email: nicola.peters@securedatamgt.com

Correspondence address: Hangar 8, Aston Down Airfield, Cowcombe Lane, Stroud. GL6 8HR.

- The Data Processor has appointed an EU Representative who is the point of contact for all matters related to Data Security and Processing of EU Data Subjects and who will supply copies of the Data Processing Agreement (DPA), the SDM Data Protection Policy and any other related external policies related to Data Security to the Data Controller on demand.

- EU Representative Contact Details: -

Name: Claire Trévien

Position: EU Representative (EU Data Protection)

Email: EU.DATA@securedatamgt.com

Correspondence address: Secure Data Management Ltd, 2 bis rue Haute, 29000 QUIMPER. FRANCE.

Notification to the Information Commissioner's Office (ICO)

Secure Data Management Ltd has notified the Information Commissioner that it is a data controller and/or processor and that it processes personal data. Secure Data Management Ltd has identified and recorded all the personal data that it processes in the Data Register.



DATA PROTECTION POLICY (continued)

A record of notification to the ICO is retained by the Data Protection Officer and the ICO Notification Handbook is used as the authoritative guidance for notification. This notification is reviewed annually and update notifications issued accordingly.

The Data Protection Officer (UK) is responsible for reviewing the details of notification to ensure that any changes to the way Secure Data Management Ltd processes or controls personal data is (as determined by changes to the Data Register and following management review) referred back to the ICO. Additional requirements for notification may also arise from Personal Data Impact Assessments.

The policy applies to all Employees and Processors of Secure Data Management Ltd such as outsourced suppliers. Any breach of the relevant EU and UK Data Protection Regulation will be considered as a breach of the disciplinary policy and could also be considered a criminal offence, potentially resulting in prosecution.

All third parties working with or for Secure Data Management Ltd and who have or may have access to personal information, will be expected to comply with this policy. All third parties who require access to personal data will be required to sign a confidentiality agreement before access is permitted. This agreement will ensure that the third party has the same legal obligations as Secure Data Management Ltd. This will also include an agreement that Secure Data Management Ltd can audit compliance with the agreement.

All relevant EU and UK Data Protection Regulation (such as the GDPR) will apply to all controllers that are established in the EU (European Union) who process the personal data of data subjects, in the context of that establishment. It will also apply to controllers outside of the EU that process personal data in order to offer goods and services, or monitor the behaviour of data subjects who are resident in the EU.

The location, for the purposes of relevant EU and UK Data Protection Regulation, of any data controller located in the EU will be the place where the Data Controller makes the key decisions related to the data processing purpose. This is likely to be Secure Data Management Ltd.'s HQ.

Any data controller that is not located within the EU, will be required to have to appoint a representative in a location that is under the jurisdiction that applies to the data that is being used in order to act on behalf of the controller and engage with the appropriate supervisory authorities for that location, such as has been appointed by Secure Data Management.

- The Data Processor has appointed an EU Representative who is the point of contact for all matters related to Data Security and Processing of EU Data Subjects and who will supply copies of the Data Processing Agreement (DPA), the SDM Data Protection Policy and any other related external policies related to Data Security to the Data Controller on demand.
 - EU Representative Contact Details: -



DATA PROTECTION POLICY (continued)

Name: Claire Trévien

Position: EU Representative (EU Data Protection)

Email: EU.DATA@securedatamgt.com

Correspondence address: Secure Data Management Ltd, 2 bis rue Haute, 29000 QUIMPER. FRANCE.

Key Definitions

Personal data – this is defined as any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special categories of personal data (i.e. sensitive data) – personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Data controller – the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Data subject – any living individual who is the subject of personal data held by an organisation.

EU Representative – an individual who is the point of contact for all matters related to Data Security and Processing of EU Data Subjects.

Processing – any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Profiling – is any form of automated processing of personal data intended to evaluate certain personal aspects relating to a natural person, or to analyse, or predict that person's performance at work, economic situation, location, health, personal preferences, reliability, or behaviour. This definition is linked to the right of the data subject to object to profiling and a right to be informed about the existence of profiling, of measures based on profiling and the envisaged effects of profiling on the individual.



Personal data breach – a breach of security leading to the accidental, or unlawful, destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. There is an obligation on the controller to report

DATA PROTECTION POLICY (continued)

personal data breaches to the supervisory authority (usually the Information Commissioner's Office) where the breach is likely to adversely affect the personal data or privacy of the data subject.

Data subject consent - means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data.

Child – the GDPR defines a child as anyone under the age of 16 years old. The processing of personal data of a child under 13 years of age is only lawful if parental or custodian consent has been obtained.

Third party – a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Filing system – any structured set of personal data which is accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

Company Responsibilities

Secure Data Management Ltd is a data controller and a data processor as defined under the GDPR and relevant EU and UK Data Protection Regulation.

Senior Management and all those in managerial or supervisory roles throughout Secure Data Management Ltd are responsible for developing and encouraging good information handling practices within the organisation; responsibilities are set out in individual job descriptions.

A Data Protection Officer, a member of the senior management team, is accountable to the top management of Secure Data Management Ltd for the management of personal information within Secure Data Management Ltd and for ensuring that compliance with data protection legislation and good practice can be demonstrated. This accountability includes the development and implementation of security and risk management to ensure compliance.

Secure Data Management Ltd has appointed a suitably qualified and experienced Data Protection Officer (DPO) who is responsible for day to day compliance with this policy. The DPO is responsible for ensuring that Secure Data Management Ltd complies with relevant EU and UK Data Protection Regulation in relation to all aspects of data processing. The DPO has direct responsibility for policy and procedures, including Subject Access Requests. The DPO is also the person to whom all staff will go to seek guidance regarding relevant EU and UK Data Protection Regulation compliance.

It should be noted that compliance with relevant EU and UK Data Protection Regulation requirements remains the responsibility of all staff who process or control personal information for Secure Data Management Ltd All members of staff employed by Secure Data Management



Ltd are also responsible for ensuring that any personal data that is about them that is supplied by them to Secure Data Management Ltd is accurate and up-to-date.

The Training Policy defines specifically what training is required for all staff, including specific roles.

DATA PROTECTION POLICY (continued)

Risk Assessment in relation to relevant EU and UK Data Protection Regulation

Secure Data Management Ltd needs to ensure that it is aware of any risks associated with the processing of all types of personal information. A Risk Assessment procedure has been implemented and is used by Secure Data Management Ltd to assess any risk to individuals during processing of their personal information. Assessments will also be completed by Secure Data Management Ltd for any processing that is undertaken on their behalf by any third-party organisation. Secure Data Management Ltd will also, through the application of the Risk Assessment procedure, ensure that any identified risks are managed appropriately to reduce the risk of non-compliance.

Where processing of personal information may result in a high risk to the “rights and freedoms” of natural persons, Secure Data Management Ltd shall complete a data protection impact assessment, prior to conducting the processing, to ensure the personal information is protected. This assessment may also be used to apply to a number of similar processing scenarios with a similar level of risk.

Where, as a result of a Data Protection Impact Assessment, it is clear that Secure Data Management Ltd will process personal information in a manner that may cause damage and/or distress to the data subjects, the DPO must review the process before Secure Data Management Ltd proceeds to process the information. If the DPO decides that there are significant risks to the data subject they will escalate to the ICO for final guidance. The organisation shall apply selected controls for the ISO 27001 Annex A to reduce risk. This should also reference Secure Data Management Ltd’s risk acceptance criteria and the requirements of relevant EU and UK Data Protection Regulation.

Principles of Data Protection

Any processing of personal data must be conducted in accordance with the following data protection principles of the Regulation, and Secure Data Management Ltd’s policies and procedures will ensure compliance.

Personal data must be processed lawfully, fairly and transparently. Secure Data Management Ltd’s Fair Processing Procedure details how this is achieved.

The relevant EU and UK Data Protection Regulation (such as the GDPR) introduces the requirement for transparency whereby the controller has transparent and easily accessible policies relating to the processing of personal data and the exercise of individuals’ ‘rights and freedoms’.

Information must be communicated to the data subject in an intelligible form using clear and plain language.



The specific information that must be provided to the data subject must as a minimum include:

- The identity and the contact details of the controller and, if any, of the controller's representative
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DATA PROTECTION POLICY (continued)

- The contact details of the Data Protection Officer, where applicable
- The purposes of the processing for which the personal data are intended as well as the legal basis for the processing
- The period for which the personal data will be stored
- The existence of the rights to request access, rectification, erasure or to object to the processing
- The categories of personal data concerned
- The recipients or categories of recipients of the personal data, where applicable
- Where applicable, that the controller intends to transfer personal data to a recipient in a third country and the level of protection afforded to the data
- Any further information necessary to guarantee fair processing.

Personal data can only be collected for specified, explicit and legitimate purposes. Data obtained for specified purposes must not be used for a purpose that differs from those formally notified to the Information Commissioner as part of Secure Data Management Ltd.'s relevant EU and UK Data Protection Regulation registration.

Personal data must be adequate, relevant and limited to what is necessary for processing. The Data Protection Officer is responsible for ensuring that information, which is not strictly necessary for the purpose for which it is obtained, is not collected.

All data collection methods (electronic or paper-based), including data collection requirements in new information systems, must be approved by the Data Protection Officer and approval recorded.

The Data Protection Officer will ensure that all data collection methods are reviewed annually by internal audit or external experts to ensure that collection continues to be adequate, relevant and not excessive.

The DPO is responsible for ensuring that any data that is shown to have been obtained excessively, or is not specifically required by Secure Data Management Ltd is securely deleted or destroyed (see A.8.3.2 and A.11.2.7).

Other Considerations

Personal data must be accurate and kept up to date.

Data that is kept for a long time must be reviewed and updated as necessary. Any data that is considered to be inaccurate or likely to be inaccurate must be removed.

Top management is responsible for ensuring that all staff are trained in the importance of collecting accurate data and maintaining it.



All individuals are responsible for ensuring that any data held by Secure Data Management Ltd is accurate and up-to-date. Any data submitted by an individual to a company, such as via a registration form, will be considered to be accurate at the time of receipt.

Employees or other individuals should notify Secure Data Management Ltd of any changes in personal information to ensure personal information is kept up to date. It is the responsibility

DATA PROTECTION POLICY (continued)

of Secure Data Management Ltd to ensure that any notification of changes to personal information is implemented.

The DPO is responsible for ensuring that all necessary actions are taken to ensure personal information is accurate and up to date. This should also consider the volume of data collected, the speed with which it might change and any other relevant factors.

The DPO will review, at least once a year, all the personal data processed by Secure Data Management Ltd, held in the Data Register. The DPO will note any data that is no longer required in the context of the registered purpose and will ensure that it is appropriately removed and securely disposed of (see A.8.3.2 and A.11.2.7).

If a third-party organisation has provided inaccurate or out-of-date personal information, the DPO is responsible for informing them that the personal information is inaccurate and/or out-of-date and advise them that the information should no longer be used. The DPO should also ensure that any correction to the personal information is passed on to the third party.

Personal Data Considerations

Personal data must be kept in a form such that the data subject can be identified only as long as is necessary for processing.

Where personal data is retained beyond the processing date, it will be encrypted in order to protect the identity of the data subject in the event of a data breach.

Personal data will be retained in line with the retention of records procedure and, once its retention date is passed, it must be securely destroyed as set out in the Retention of Records Procedure.

The DPO must specifically approve any data retention that exceeds the retention periods defined in the Retention of Records procedure and must ensure that the justification is clearly identified and in line with the requirements of the data protection legislation. This approval must be written.

Personal data must be processed in a manner that ensures its security.

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. These controls have been selected on the basis of identified risks to personal data, and the potential for damage or distress to individuals whose data is being processed. Security controls will be subject to audit and review.



Secure Data Management Ltd's compliance with this principle is contained in its Information Security Management System (ISMS), which has been developed in line with ISO/IEC 27001:2013 and the Security Policy set out in the ISMS Manual.

Personal data shall not be transferred to a country or territory outside the European Union Member States unless that country or territory ensures an adequate level of protection for the 'rights and freedoms' of data subjects in relation to the processing of personal data.

DATA PROTECTION POLICY (continued)

The transfer of personal data outside of the EU Member States is prohibited unless one or more of the specified safeguards or exceptions apply.

Safeguards

An assessment of the adequacy by the data controller considering the following factors:

- The nature of the information being transferred
- The country or territory of the origin, and final destination, of the information
- How the information will be used and for how long
- The laws and practices of the country of the transferee, including relevant codes of practice and international obligations and
- The security measures that are to be taken as regards the data in the overseas location. (This is a UK-specific option.)

Binding corporate rules

Secure Data Management Ltd may adopt approved Binding Corporate Rules for the transfer of data outside the EU Member States. This requires submission to the relevant Supervisory Authority for approval of the rules that Secure Data Management Ltd is seeking to rely upon.

Model contract clauses

Secure Data Management Ltd may adopt approved model contract clauses for the transfer of data outside of the EU Member States. If Secure Data Management Ltd adopts the model contract clauses approved by the relevant Supervisory Authority there is an automatic recognition of adequacy.

Exceptions

In the absence of an adequacy decision, including binding corporate rules, for the transfer of personal data to a third country, or an international organisation, it shall take place only on one of the following conditions:

- The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards
- The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request



- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person
- The transfer is necessary for important reasons of public interest
- The transfer is necessary for the establishment, exercise or defence of legal claims
- The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent

DATA PROTECTION POLICY (continued)

- The transfer is made from a register which according to Union or Member State law is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union or Member State law for consultation are fulfilled in the particular case.

A list of countries that satisfy the adequacy requirements of the Commission are published in the Official Journal of the European Union and in the GDPR 2016.

Accountability

Relevant EU and UK Data Protection Regulation (namely the GDPR) states that the controller is not only responsible for ensuring compliance but for demonstrating that each processing operation complies with the requirements of the GDPR. As a result, controllers are required to keep all necessary documentation of all processing operations, and implement appropriate security measures. They are also responsible for completing Data Processing Impact Assessments (DPIAs), complying with requirements for prior notifications, or approval from supervisory authorities and ensuring a DPO is appointed if required.

Data subjects' rights

Data subjects have the following rights regarding data processing, and the data that is recorded about them:

- To make subject access requests regarding the nature of information held and to whom it has been disclosed
- To prevent processing likely to cause damage or distress
- To prevent processing for purposes of direct marketing
- To be informed about the mechanics of automated decision-taking process that will significantly affect them
- Not to have significant decisions that will affect them taken solely by automated process
- To sue for compensation if they suffer damage by any contravention of relevant EU and UK Data Protection Regulation
- To take action to rectify, block, erase, including the right to be forgotten, or destroy inaccurate data
- To request the ICO to assess whether any provision of the relevant EU and UK Data Protection Regulation has been contravened
- The right for personal data to be provided to them in a structured, commonly used and machine-readable format, and the right to have that data transmitted to another controller



- The right to object to any automated profiling without consent.
- Data subjects may make data access requests as described in the Subject Access Requests procedure. This procedure also describes how Secure Data Management Ltd will ensure that its response to the data access request complies with the requirements of the Regulation.

DATA PROTECTION POLICY (continued)

Complaints

A Data Subject has the right to complain to at any time to Secure Data Management Ltd if they have concerns about how their information is used. If they wish to lodge a complaint this should be directed to the DPO or the EU Representative if it involves an EU Data Subject, following the complaints procedure in writing through the 'Contact Us' section of the company website.

A Data Subject also has the option to complain directly to the Information Commissioner's Office or relevant European Authority. Details of the options for lodging a complaint should be provided by Secure Data Management Ltd usually within the 'Contact Us' section on the company website.

Consent

Secure Data Management Ltd understands 'consent' to mean that it has been explicitly and freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she by statement, or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. The consent of the data subject can be withdrawn at any time.

In addition, Secure Data Management Ltd understands 'consent' to mean that the data subject has been fully informed of the intended processing and has signified their agreement, while in a fit state of mind to do so and without pressure being exerted upon them. Consent obtained under duress or on the basis of misleading information will not be a valid basis for processing. There must be some active communication between the parties which demonstrate active consent. Consent cannot be inferred from non-response to a communication. For sensitive data, explicit written consent of data subjects must be obtained unless an alternative legitimate basis for processing exists.

Consent to process personal and sensitive data is obtained routinely by Secure Data Management Ltd using standard consent documents. This may be through a contract of employment or during induction.

Where Secure Data Management Ltd provides online services to children, parental, or custodial authorisation must be obtained. This requirement applies to children under the age of 16 (unless the Member State has made provision for a lower age limit – which may be no lower than 13).



Data Security

All Secure Data Management Ltd Staff that are responsible for any personal data which Secure Data Management Ltd holds must keep it securely and ensure that it is not disclosed under any conditions to any third party unless that third party has been specifically authorised by Secure Data Management Ltd to receive that information and has entered into a confidentiality agreement.

DATA PROTECTION POLICY (continued)

All personal data should be accessible only to those who need to use it, and access may only be granted in line with the Access Control Policy. You should form a judgment based upon the sensitivity and value of the information in question, but personal data must be kept:

- In a lockable room with controlled access; and/or
- In a locked drawer or filing cabinet; and/or
- If computerised, it must be password protected in line with the Access Control Policy
- Stored on encrypted removable media in line with the Cryptographic Controls Policy.
- Care must be taken to ensure that PC screens and terminals are not visible except to authorised Staff of Secure Data Management Ltd. All Staff must sign up to the Acceptable Use Policy before they are given access to organisational information of any sort.

Manual records may not be left where they can be accessed by unauthorised personnel and may not be removed from business premises without explicit [written] authorisation. As soon as manual records are no longer required for day-to-day client support, they must be removed from secure archiving in line with SDM procedure.

Personal data may only be deleted or disposed of in line with the Retention of Records procedure. Manual records that have reached their retention date are to be shredded and disposed of as 'confidential waste'. Hard drives of redundant PCs are to be removed and immediately destroyed (see A.8.3.2 and A.11.2.7). Because of the increased risk all Staff must be specifically authorised to process data off-site.

Rights of access to data

Data subjects have the right to access any personal data (i.e. data about them) which is held Secure Data Management Ltd, in electronic format and manual records which form part of a relevant filing system. This includes the right to inspect confidential personal references received by Secure Data Management Ltd and information obtained from third-party organisations about that person. Subject Access Requests are dealt with as described in the Subject Access Request Procedure.

Disclosure of data

Secure Data Management Ltd must ensure that personal data is not disclosed to unauthorised third parties which includes family members, friends, government bodies, and in certain circumstances, the Police. All Employees/Staff should exercise caution when asked to disclose personal data held on another individual to a third party [and will be required to attend



specific training that enables them to deal effectively with any such risk]. It is important to bear in mind whether or not disclosure of the information is relevant to, and necessary for, the conduct of Secure Data Management Ltd's business.

Relevant EU and UK Data Protection Regulation permits a number of exemptions where certain disclosure without consent is permitted, as long as the information is requested for one or more of the following purposes:

DATA PROTECTION POLICY (continued)

- To safeguard national security
- Prevention or detection of crime including the apprehension or prosecution of offenders
- Assessment or collection of tax duty
- Discharge of regulatory functions (includes health, safety and welfare of persons at work)
- To prevent serious harm to a third party
- To protect the vital interests of the individual, this refers to life and death situations.

All requests to provide data for one of these reasons must be supported by appropriate paperwork and all such disclosures must be specifically authorised by the Data Protection Officer.

Retention and disposal of data

Personal data may not be retained for longer than it is required. Once a member of staff has left Secure Data Management Ltd it may not be necessary to retain all the information held on them. Some data will be kept for longer periods than others. Secure Data Management Ltd's data retention and data disposal procedures will apply in all cases.

Disposal of records

Personal data must be disposed of in a way that protects the "rights and freedoms" of data subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) (see A.8.3.2 and A.11.2.7).

E-mail and Internet privacy

The inappropriate use of e-mail and the Internet by employees, e.g. using the Internet for non-work purposes, can have significant consequences for our Organisation. This can be in terms of:

- Embarrassment/damage to the Organisation's reputation
- Loss of productivity
- Increased risk of liability and legal action, e.g. for sexist or racist e-mails
- Increased virus risk



To avoid inappropriate usage, we have introduced security electronic safeguards. A firewall checks, guarantees and manages e-mail attachments. The Organisation has installed filtering software that searches e-mails for specific words or phrases, normally obscene or discriminatory, and monitors which websites our employees are accessing as well as filtering which types of websites our employees can access.

Acceptable use of E-mail and the Internet

Please see the E-mail and Internet Acceptable Usage Policy.

DATA PROTECTION POLICY (continued)

In addition, the Organisation's employees will be kept fully informed about overall information security procedures and the importance of their role within these procedures. Similarly, manual filing systems are held in secure locations and only authorised employees can access them.

RESPONSIBILITIES & REVIEW

The Quality Manager has overall responsibility for the administration and implementation of the Organisation's Data Protection Policy.

Each Department Manager will assume authority for the compliance of the employees within their department.

This Policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to relevant EU and UK Data Protection Regulation.

The Data Protection Policy will, under normal circumstances, be managed and reviewed annually. The reviews to the Policy will be subject to scrutiny and, from time to time, updates and re-issues will be circulated.

However, the Policy will be reviewed sooner in the event of any one or more of the following:

- Weakness in the Policy is highlighted
- Weaknesses in hardware and software controls are identified
- In case of new threat(s) or changed risks
- Changes in legislative requirements
- Changes in Government, company or other directives and requirements.

Signed by

A handwritten signature in black ink, appearing to read 'N. Peters'.

Date: 10/12/2020

Nicola Peters (SDM Quality & Compliance Manager)

On behalf of Secure Data Management Limited.

Version 2.0



Date of next review: 16/06/2021