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1. Introduction

This Policy sets out the Company name>>, a company registered in <<insert cou under number <<insert company registration number>>, w is at <<insert address>> ("the Company") regarding data s of its employees (in this context, "employee data subjects") al data under Data Protection Law (all legislation and regulatio ime regulating the use of personal data and the privacy of el s including, but not limited to, EU Regulation 2016/679 Ge Regulation ("GDPR"), the Data Protection Act 2018, and n or other directly applicable EU regulation relating to data p as long as, and to the extent that, EU law has legal effect in t

This Policy sets out the C garding the collection, processing, transfer, storage, and disp lating to employee data subjects. The procedures and princ st be followed at all times by the Company, its employees, a other parties working on behalf of the Company.

2. Definitions

"consent" consent of the data subject which eely given, specific, informed, and s indication of the data subject's hich they, by a statement or by a tive action, signify their agreement ssing of personal data relating to

"data controller" natural or legal person or which, alone or jointly with others, the purposes and means of the f personal data. For the purposes cy, the Company is the data f all personal data relating to ta subjects;

"data processor" natural or legal person or which processes personal data a data controller;

"data subject" iving, identified, or identifiable son about whom the Company al data (in this context, employee s);

"EEA" European Economic Area, f all EU Member States, Iceland,

n, and Norway;

“personal data” information relating to a data can be identified, directly or particular by reference to an uch as a name, identification ation data, an online identifier, or re factors specific to the physical, genetic, mental, economic, ocial identity of that data subject;

“personal data breach” each of security leading to the or unlawful destruction, loss, unauthorised disclosure of, or ersonal data transmitted, stored, processed;

“processing” operation or set of operations on personal data or sets of a, whether or not by automated ch as collection, recording, structuring, storage, adaptation n, retrieval, consultation, use, y transmission, dissemination or making available, alignment or restriction, erasure or

“pseudonymisation” rocessing of personal data in such at the personal data can no longer to a specific data subject without dditional information, provided that nal information is kept separately ct to technical and organisational ensure that the personal data is d to an identified or identifiable n; and

“special category person nal data revealing racial or ethnic itical opinions, religious or beliefs, trade union membership,

xual life, sexual orientation, genetic data.

3. **Scope**

3.1 The Company is co letter of the law, but also to the spirit of the law an e on the correct, lawful, and fair handling of all pers legal rights, privacy, and trust of all individuals with w

3.2 The Company's Da <<insert name of data protection officer>>, <<insert ne Data Protection Officer is responsible **[**, wor <<insert department, e.g. HR Department, or posi **]** for administering this Policy and for developing and able related policies, procedures, and/or guidelines.

3.3 All <<insert appli managers, department heads, supervisors etc.>> uring that all employees, agents, contractors, or othe half of the Company comply with this Policy and, whe ement such practices, processes, controls, and trai ly necessary to ensure such compliance.

3.4 Any questions relat Data Protection Law should be referred to the Da particular, the Data Protection Officer should alway owing cases:

a) if there is to the lawful basis on which employee pe cted, held, and/or processed;

b) if consent is der to collect, hold, and process employee pe

c) if there is a to the retention period for any particular typ al data;

d) if any new otices or similar privacy-related documentati

e) if any assis ealing with the exercise of an employee d cluding, but not limited to, the handling of s

f) if a personal or actual) has occurred;

g) if there is a to security measures (whether technical or d to protect employee personal data;

h) if employee hared with third parties (whether such third pa ontrollers or data processors);

i) if employee ansferred outside of the EEA and there are que al basis on which to do so;

j) when any si g activity is to be carried out, or significant ch to existing processing activities, which will re pact Assessment;

k) when employ be used for purposes different to those for whi ted;

l) if any autom ng profiling or automated decision-making, is to

m) if any assist plying with the law applicable to direct marke

4. **The Data Protection Princ**

This Policy aims to ensure otection Law. The GDPR sets out the following principles with personal data must comply. Data controllers are responsible to demonstrate, such compliance. All personal data must be:

4.1 processed lawfully, ent manner in relation to the data subject;

4.2 collected for speci imate purposes and not further processed in a ma ble with those purposes. Further processing for arch blic interest, scientific or historical research purposes shall not be considered to be incompatible with th

4.3 adequate, relevant is necessary in relation to the purposes for which

4.4 accurate and, wher date. Every reasonable step must be taken to ensure s inaccurate, having regard to the purposes for which , or rectified without delay;

4.5 kept in a form which data subjects for no longer than is necessary for the p rsonal data is processed. Personal data may be store ofar as the personal data will be processed solely fo the public interest, scientific or historical research p urposes, subject to implementation of the appropriate tional measures required by the GDPR in order to sa eedoms of the data subject;

4.6 processed in a man riate security of the personal data, including protection unlawful processing and against accidental loss, d using appropriate technical or organisational meas

5. **The Rights of Data Subje**

The GDPR sets out the foll ble to data subjects:

5.1 the right to be inform

5.2 the right of access;

5.3 the right to rectificat

5.4 the right to erasure to be forgotten');

5.5 the right to restrict p

5.6 the right to data por

5.7 the right to object; a

5.8 rights with respect t aking and profiling.

6. **Lawful, Fair, and Transpa**

6.1 Data Protection Law ersonal data is processed lawfully, fairly, and transpar affecting the rights of the data subject. Specifically processing of personal data shall be lawful only if at le applies:

a) the data sub o the processing of their personal data for one s;

b) the processi erformance of a contract to which the data sub er to take steps at the request of the data sub a contract;

c) the processi npliance with a legal obligation to which the da

d) the processi ect the vital interests of the data subject or of

e) the processi erformance of a task carried out in the public in of official authority vested in the data controll

f) the processi urposes of the legitimate interests pursued by a third party, except where such interests are mental rights and freedoms of the data subject on of personal data, in particular where the da

6.2 If the personal data ategory personal data (also known as 'sensitive perso f the following conditions must be met in addition to on ut above:

a) the data sub licit consent to the processing of such data f ed purposes (unless EU or EU Member Sta n doing so);

b) the process he purpose of carrying out the obligations a ghts of the data controller or of the data subject ment, social security, and social protection la rised by EU or EU Member State law or a coll nt to EU Member State law which provides for s for the fundamental rights and interests of t

c) the processi ect the vital interests of the data subject or son where the data subject is physically or g consent;

d) the data con ssociation, or other non-profit body with a politi ous, or trade union aim, and the processing ourse of its legitimate activities, provided tha solely to the members or former members of who have regular contact with it in connection that the personal data is not disclosed ou e consent of the data subjects;

e) the processi ta which is manifestly made public by the data s

f) the process… the conduct of legal claims or whenever co… dicial capacity;

g) the processi… stantial public interest reasons, on the basis of … e law which shall be proportionate to the aim … the essence of the right to data protection, a… uitable and specific measures to safeguard th… l interests of the data subject;

h) the process… he purposes of preventative or occupationa… ssment of the working capacity of an employee… for the provision of health or social care or treat… nt of health or social care systems or services … Member State law or pursuant to a contract w… al, subject to the conditions and safeguards … of the GDPR;

i) the processi… lic interest reasons in the area of public healt… ing against serious cross-border threats to h… tandards of quality and safety of health care … s or medical devices, on the basis of EU or EU … provides for suitable and specific measures to… d freedoms of the data subject (in particular, pr…

j) the process… rchiving purposes in the public interest, sc… esearch purposes, or statistical purposes in … 9(1) of the GDPR based on EU or EU Member … proportionate to the aim pursued, respect the … data protection, and provide for suitable and… safeguard the fundamental rights and the inter…

7. Consent

If consent is relied upon as… ecting, holding, and/or processing any personal data, the follo…

7.1 Consent is a clea… subject that they agree to the processing of their p… ear indication may take the form of a statement or a p… re-ticked boxes, or inactivity are unlikely to amount t…

7.2 Where consent is … which includes other matters, the section dealing wit… clearly separate from such other matters.

7.3 Data subjects are f… at any time and it must be made easy for them to do… draws consent, their request must be honoured promp…

7.4 If personal data is t… erent purpose that is incompatible with the purpose … hat personal data was originally collected that was … subject when they first provided their consent, cons… e or purposes may need to be obtained from the d…

7.5 Where special cat… processed, the Company shall normally rely on a la… plicit consent. If explicit consent is

relied upon, the data ... st be issued with a suitable privacy notice in order to ca...

7.6 In all cases where ... as the lawful basis for collecting, holding, and/or proc... cords must be kept of all consents obtained in order to ... y can demonstrate its compliance with consent require...

8. **Specified, Explicit, and L...**

8.1 The Company colle... employee personal data set out in Parts 23 to 28 of thi...

a) personal dat... employee data subjects**[.] OR [**; and**]**

b) **[**personal da... rties.**]**

8.2 The Company only ... holds employee personal data for the specific purpos... to 28 of this Policy (or for other purposes expressly ... ction Law).

8.3 Employee data sub... med at all times of the purpose or purposes for which ... personal data. Please refer to Part 15 for more informa... jects informed.

9. **Adequate, Relevant, and ... g**

9.1 The Company will c... employee personal data for and to the extent necessa... e or purposes of which employee data subjects have ... informed) as under Part 8, above, and as set out in Pa...

9.2 Employees, agents ... parties working on behalf of the Company may colle... ata only to the extent required for the performance of ... ly in accordance with this Policy. Excessive personal ... ed.

9.3 Employees, agents ... parties working on behalf of the Company may proc... data only when the performance of their job duties re... sonal data held by the Company cannot be processe... ons.

10. **Accuracy of Data and Ke...**

10.1 The Company sha... ployee personal data collected, processed, and held ... nd up-to-date. This includes, but is not limited to, the r... ata at the request of an employee data subject, as set...

10.2 The accuracy of em... all be checked when it is collected and at **[**regular**] OR** ... ervals thereafter. If any employee personal data is fou... t-of-date, all reasonable steps will be taken without de... at data, as appropriate.

10.3 It is the responsibili... e data subjects to ensure that the personal data they ... ompany is kept up-to-date. If any such personal data ... should ensure that the relevant

member of staff a… …ormed as soon as is reasonably possible. The Com… …peration of its employees to help meet its obligations … …aw.

11. **Data Retention**

11.1 The Company shal… …rsonal data for any longer than is necessary in light … …poses for which it was originally collected, held, and …

11.2 When employee pe… …required, all reasonable steps will be taken to erase o… …securely and without delay.

11.3 For full details of … …ach to data retention, including retention periods fo… …ypes held by the Company, please refer to our Data Re…

12. **Secure Processing**

12.1 The Company shal… …ee personal data collected, held, and processed is k… …against unauthorised or unlawful processing and ag… …destruction, or damage. Further details of the techn… …easures which shall be taken are provided in Parts 29…

12.2 All technical and or… …aken to protect employee personal data shall be regu… …aluated to ensure their ongoing effectiveness and th… …mployee personal data.

12.3 Data security must … …s by protecting the confidentiality, integrity, and availa… …sonal data as follows:

a) only those w… …ccess and use employee personal data and wh… …may access and use it;

b) employee pe… …urate and suitable for the purpose or purposes … …held, and processed; and

c) authorised u… …ble to access employee personal data as requ… …urpose or purposes.

13. **Accountability and Recor…**

13.1 The Data Protectio… …nsible **[**, working together with the <<insert departmen… …or position, e.g. HR Manager>>,**]** for administering t… …veloping and implementing any applicable related p… …or guidelines.

13.2 The Company shal… …esign' approach at all times when collecting, holding, … …ee personal data. Data Protection Impact Assessmen… … if any processing presents a significant risk to th… …f employee data subjects (please refer to Part 14 for f…

13.3 All employees, age… …r parties working on behalf of the Company shall be … …g in data protection and privacy, addressing the rele… …rotection Law, this Policy, and all other applicable Co…

13.4 The Company's da e shall be regularly reviewed and evaluated by means ts.

13.5 The Company sha records of all employee personal data collection, hold ich shall incorporate the following information:

a) the name ar y, its Data Protection Officer, and any applicab ers (including data processors and other data c sonal data is shared);

b) the purpose ny collects, holds, and processes employee pe

c) the Compar es (including, where applicable, consent, the ning such consent, and records of such conse ding, and processing employee personal dat

d) details of the personal data collected, held, and processed b he categories of employee data subject to wh lates;

e) details of a yee personal data to non-EEA countries inc nd security safeguards;

f) details of ho onal data will be retained by the Company (p ny's Data Retention Policy);

g) details of em rage, including location(s);

h) detailed des al and organisational measures taken by the he security of employee personal data.

14. **Data Protection Impact A y by Design**

14.1 In accordance with rinciples, the Company shall carry out Data Protection r any and all new projects and/or new uses of emp which involve the use of new technologies and w ved is likely to result in a high risk to the rights and fre subjects.

14.2 The principles of ' ld be followed at all times when collecting, holding, yee personal data. The following factors should be ta

a) the nature, s ose or purposes of the collection, holding, and

b) the state o ant technical and organisational measures to

c) the cost of in res; and

d) the risks po subjects and to the Company, including the

14.3 Data Protection Imp e overseen by the Data Protection Officer and shall ad

a) the type(s) o ta that will be collected, held, and processed;

b) the purpose(ersonal data is to be used;

c) the Compan

d) how employ used;

e) the parties (i who are to be consulted;

f) the necessit he data processing with respect to the purpose(ocessed;

g) risks posed t s;

h) risks posed mpany; and

i) proposed me handle identified risks.

15. **Keeping Data Subjects In**

15.1 The Company shall set out in Part 15.2 to every data employee data subj

a) Where emp collected directly from employee data subject a subjects will be informed of its purpose at t

b) where empl obtained from a third party, the relevant emp be informed of its purpose:

i) if the o communicate with the employee data mmunication is made; or

ii) if the ansferred to another party, before that t

iii) as so le and in any event not more than one m data is obtained.

15.2 The following inform n the form of a privacy notice:

a) details of the t not limited to, all relevant contact details, and ntact details of any applicable representati on Officer;

b) the purpose(e personal data is being collected and will be p Parts 23 to 28 of this Policy) and the lawful ba on and processing;

c) where applic rests upon which the Company is justifying its g of the employee personal data;

d) where the e is not obtained directly from the employee da es of personal data collected and processed;

e) where the e s to be transferred to one or more third parties,

f) where the e s to be transferred to a third party that is locate tails of that transfer, including but not limited t ce (see Part 32 of this Policy for further detail

g) details of ap eriods;

h) details of the … s rights under the GDPR;

i) details of the … s right to withdraw their consent to the Compan… personal data at any time (where applicable);

j) details of t… bject's right to complain to the Information … (the 'supervisory authority' under the GDPR);

k) where the e… is not obtained directly from the employee da… the source of that personal data;

l) where appli… gal or contractual requirement or obligation ne… n and processing of the employee personal dat… sequences of failing to provide it; and

m) details of a… making or profiling that will take place using … data, including information on how decisions wi… ance of those decisions, and any consequenc…

16. **Data Subject Access**

16.1 Employee data sub… access requests ("SARs") at any time to find out mor… a which the Company holds about them, what it is doin… , and why.

16.2 Employees wishing… uld do using a Subject Access Request Form, sen… mpany's Data Protection Officer at <<insert contact det…

16.3 Responses to SAR… ade within one month of receipt; however, this may … wo months if the SAR is complex and/or numerous re… ch additional time is required, the data subject shall b…

16.4 All SARs received s… Company's Data Protection Officer **[**in accordance with… ubject Access Request Policy and Procedure**]**.

16.5 The Company does… he handling of normal SARs. The Company reserves … nable fees for additional copies of information that has… to an employee data subject, and for requests that a… or excessive, particularly where such requests are r…

17. **Rectification of Personal …**

17.1 Employee data subj… uire the Company to rectify any of their personal data … mplete.

17.2 The Company shall… sonal data in question, and inform the employee data… cation, within one month of the employee data subj… ny of the issue. The period can be extended by up to… se of complex requests. If such additional time is re… a subject shall be informed.

17.3 In the event that an… rsonal data has been disclosed to

third parties, those d of any rectification that must be made to that perso

18. **Erasure of Personal Data**

18.1 Employee data sub equest that the Company erases the personal data it following circumstances:

a) it is no lon Company to hold that employee personal da rpose(s) for which it was originally collected or

b) the employe to withdraw their consent (where applicable) g and processing their personal data;

c) the employ s to the Company holding and processing there is no overriding legitimate interest to al inue doing so) (see Part 21 of this Policy for fur he right to object);

d) the employe n processed unlawfully;

e) the employe s to be erased in order for the Company to legal obligation**[**;**] OR [**.**]**

f) **[**the employ eing held and processed for the purpose of p ety services to a child.**]**

18.2 Unless the Compa nds to refuse to erase employee personal data, all shall be complied with, and the employee data subj ure, within one month of receipt of the employee data s eriod can be extended by up to two months in the case uch additional time is required, the employee data subj

18.3 In the event that an a that is to be erased in response to an employee da s been disclosed to third parties, those parties shall b e (unless it is impossible or would require disproportio

19. **Restriction of Personal D**

19.1 Employee data subj ed circumstances, request that the Company ceases data it holds about them. If an employee data subj est, the Company shall retain only the amount of emp ncerning that data subject (if any) that is necessary to data in question is not processed further.

19.2 In the event that ar rsonal data has been disclosed to third parties, those d of the applicable restrictions on processing it (unles d require disproportionate effort to do so).

20. **[Data Portability**

20.1 The Company pr a relating to employees using

automated means. <<...ated processing>>.

20.2 Where employee d... their consent to the Company to processing their p... a manner, or the processing is otherwise required ... a contract between the Company and the employee c... ata subjects have the right, under the GDPR, to rece... onal data and to use it for other purposes (namely t... a controllers).

20.3 To facilitate the righ... Company shall make available all applicable personal ... ubjects in the following format**[**s**]**:

a) <<list format...

b) <<add furthe...

20.4 Where technically ... by an employee data subject, personal data shall ... quired data controller.

20.5 All requests for co... onal data shall be complied with within one month o... ject's request. The period can be extended by up to t... complex or numerous requests. If such additional time... e data subject shall be informed.**]**

21. Objections to Personal D...

21.1 Employee data sub... bject to the Company processing their personal dat... interests, for direct marketing (including profiling), ... ntific and/or historical research and statistics purposes.

21.2 Where an employe... to the Company processing their personal data base... ts, the Company shall cease such processing immedia... emonstrated that the Company's legitimate grounds ... rride the employee data subject's interests, rights, an... processing is necessary for the conduct of legal cla...

21.3 Where an employe... to the Company processing their personal data for d... s, the Company shall cease such processing promptly...

21.4 Where an employe... to the Company processing their personal data for s... research and statistics purposes, the employee data... e GDPR, "demonstrate grounds relating to his or h... The Company is not required to comply if the resea... performance of a task carried out for reasons of publi...

22. **[**Automated Processing, ... aking, and Profiling

22.1 **[**The Company use... ning its employees in automated decision-making pr...

a) <<Insert det... n-making>>.**]**

22.2 **[**The Company us... rning its employees for profiling purposes as follows...

a) <<Insert det... >.**]**

22.3 The activities desc e generally prohibited under Data Protection Law wh sions have a legal or similarly significant effect on e of the following applies:

a) the data sub cit consent;

b) the processi or

c) the processi entry into, or performance of, a contract betw he data subject.

22.4 If special category processed in this manner, such processing can only he following applies:

a) the data sub cit consent; or

b) the processi ns of substantial public interest.

22.5 Where decisions a automated processing (including profiling), employee right to object, to challenge such decisions, request h press their own point of view, and to obtain an explan m the Company. Employee data subjects must be ex ght at the first point of contact.

22.6 In addition to the ab ust be provided to employee data subjects explaining decision-making or profiling, and the significance and es of the decision or decisions.

22.7 When employee pe ny form of automated processing, automated decision following shall apply:

a) appropriate l procedures shall be used;

b) technical a sures shall be implemented to minimise the ccur, such measures must enable them to be e

c) all personal this manner shall be secured in order to pre cts arising (see Parts 29 to 34 of this Policy data security and organisational measures).**]**

23. Personal Data

The Company holds a r about its employees. Employee personal data shall be col sed in accordance with employee data subjects' rights and t ns under the GDPR and with this Policy. The Company ma cess the employee personal data detailed in Parts 23 to 28 of data retention, please refer to the Company's Data Reten

23.1 Identification inform es:

a) Name;

b) Contact Det

c) <<add furthe

23.2 Equal opportunities Please refer to Part 24, below, for further information):

a) Age;

b) Gender;

c) Ethnicity;

d) Nationality;

e) Religion;

f) <<add furthe

23.3 Health records (Ple w, for further information):

a) Details of sic

b) Medical con

c) Disabilities;

d) Prescribed n

e) <<add furthe

23.4 Employment record

a) Interview no

b) CVs, applica rs, and similar documents;

c) Assessment and similar documents;

d) Details of r alaries, pay increases, bonuses, commission, expenses;

e) Details of tra where applicable) **[**(please refer to Part 27, belo)**]**;

f) Employee m ease refer to Part 28, below, for further inform

g) Records of uding reports and warnings, both formal and i

h) Details of g cumentary evidence, notes from interviews, p outcomes;

i) <<add furthe

24. **Equal Opportunities Mon**

24.1 The Company coll sses certain information for the purposes of monit es. Some of the personal data collected for this pu ethnic origin and religious beliefs, falls within the GDP category data (see Part 2 of this Policy for a definitio n data will be anonymised. Where special category p it will be collected, held, and processed strictly i conditions for processing special category personal rt 6.2 of this Policy. **[**No special category personal opportunities monitoring will be collected, held, or relevant employee data subject's consent.**]** **OR [**The sis for processing such data is <<insert lawful basi category data (as listed under Part 6.2)>>.**]**

24.2 **[**Non-anonymised nitoring information**]** **OR [**Equal opportunities monit be accessible and used only by

<<insert departmen and shall not be revealed to other employees, agents parties working on behalf of the Company **[**without the employee data subject(s) to whom such data r otional circumstances where it is necessary to prote f the employee data subject(s) concerned, and suc one or more of the conditions set out in Part 6.2 of thi

24.3 Equal opportunities will only be collected, held, and processed to the vent, reduce, and stop unlawful discrimination in l Act 2010, and to ensure that recruitment, promo ent, assessment, benefits, pay, terms and conditi edundancy, and dismissals are determined on the lifications, experience, skills, and productivity.

24.4 Employee data sub quest that the Company does not keep equal opportu tion about them. All requests must be made in writing ert name(s) and/or position(s) and contact details>>.

25. **Health Records**

25.1 The Company holds employee data subjects which are used to assess th d welfare of employees and to highlight any issues her investigation. In particular, the Company places a taining health and safety in the workplace, on prom , and on preventing discrimination on the grounds of d conditions. In most cases, health data on employees definition of special category data (see Part 2 of this P y and all data relating to employee data subjects' healt ected, held, and processed strictly in accordance with essing special category personal data, as set out in No special category personal data will be collected, out the relevant employee data subject's express c pany's lawful basis for processing employees' health c sis for processing special category data (as listed unde

25.2 Health records sha d only by <<insert department(s) and/or position(s)> aled to other employees, agents, contractors, or othe half of the Company **[**without the express consent of ect(s) to whom such data relates**]**, except in exception it is necessary to protect the vital interests of the emp ncerned, and such circumstances satisfy one or more in Part 6.2 of this Policy.

25.3 Health records wil d, and processed to the extent required to ensure e to perform their work correctly, legally, safely, and v impediments or discrimination.

25.4 Employee data sub quest that the Company does not keep health record requests must be made in writing and addressed to < osition(s) and contact details>>.

26. **Benefits**

26.1 In cases where emp enrolled in benefit schemes which are provided by the cessary from time to time for third party organisations ta from relevant employee data subjects.

26.2 Prior to the collec loyee data subjects will be fully informed of the pe be collected, the reasons for its collection, and the v processed, as per the information requirements set ou .

26.3 The Company sha rsonal data except insofar as is necessary in the ad nt benefits schemes.

26.4 The following sche nployees. Please note that not all schemes may be ap s:

a) <<Insert na eme>>. For further information, please cont (s), position(s), and/or third-party organisation sonal data may be collected, held, and process

i) <<ins and its purpose>>;

ii) <<ad d>>.

b) **[**<<Add furth >>.**]**

27. **[Trade Unions**

27.1 The Company will ersonal data concerning relevant employee data sub unions where those unions are recognised by the C , information about an individual's trade union membe PR's definition of special category data (see Part 4 o ion). Any and all data relating to employee data subj ership, therefore, will be collected, held, and processe with the conditions for processing special category pe Part 6.2 of this Policy. **[**No special category personal held, or processed without the relevant employee consent.**]** **OR [**The Company's lawful basis for pro y data relating to trade unions is <<insert lawful basi category data (as listed under Part 6.2)>>.**]** The followi and supplied:

27.1.1 Name;

27.1.2 Job descript

27.1.3 <<insert type purpose>>;

27.1.4 <<add furthe

27.2 All employee data s o request that the Company does not supply their pe ons and shall be informed of that right before any suc

28. **Employee Monitoring**

28.1 The Company may or the activities of employee data subjects. Such mor will not necessarily be limited to,

internet and email … that monitoring of any kind is to take place (unless … ces, such as the investigation of criminal activity or … verity, justify covert monitoring), employee data subj… the exact nature of the monitoring in advance.

28.2 Monitoring should … circumstances justify it, as above) interfere with an em…

28.3 Monitoring will only … ny considers that it is necessary to achieve the benefit… e. Personal data collected during any such monitorin… held, and processed for reasons directly related to (a… ving the intended result and, at all times, in accordanc… ubjects' rights and the Company's obligations under th…

28.4 The Company sha… no unnecessary intrusion upon employee data subj… cations or activities, and under no circumstances will … outside of an employee data subject's normal p… ours, unless the employee data subject in question … oment or other facilities including, but not limited to, C… mpany intranet, or a virtual private network ("VPN") ser… mpany for employee use.

29. **Data Security - Transferri… Communications**

The Company shall ensure… sures are taken with respect to all communications and other … oyee personal data:

29.1 All emails containi… data must be encrypted **[**using <<insert type(s) of e…

29.2 All emails containin… a must be marked "confidential";

29.3 Employee persona… tted over secure networks only; transmission over u… permitted in any circumstances;

29.4 Employee personal… mitted over a wireless network if there is a wired alte… practicable;

29.5 Employee personal… ody of an email, whether sent or received, should be… of that email and stored securely. The email itself sh… nporary files associated therewith should also be dele… od of deletion>>**]**;

29.6 Where employee p… ent by facsimile transmission the recipient should be… f the transmission and should be waiting by the fax m… a;

29.7 Where employee pe… sferred in hardcopy form it should be passed directly … nt using <<insert name(s) and/or type(s) of delivery s…

29.8 All employee perso… d physically, whether in hardcopy form or on remova… hall be transferred in a suitable container marked "c…

29.9 **[**<<Add further secu… d>>.**]**

30. **Data Security - Storage**

The Company shall ensure ures are taken with respect to the storage of employee perso

30.1 All electronic copie l data should be stored securely using passwords ar cryption>>**]** data encryption;

30.2 All hardcopies of e along with any electronic copies stored on physical, d be stored securely in a locked box, drawer, cabine

30.3 All employee perso cally should be backed up <<insert interval>> with bac **D/OR [**offsite**]**. All backups should be encrypted **[**using ption>>**]**;

30.4 No employee perso d on any mobile device (including, but not limited to, artphones), whether such device belongs to the Com out the formal written approval of <<insert name(s) a tact details>> and, in the event of such approval, str n all instructions and limitations described at the t ven, and for no longer than is absolutely necessa

30.5 No employee perso nsferred to any device personally belonging to an em r, or other party working on behalf of the Company a data may only be transferred to devices belonging t other parties working on behalf of the Company where as agreed to comply fully with the letter and spirit of Protection Law, including but not limited to the GDPR emonstrating to the Company that all suitable technica sures have been taken);

30.6 **[**<<Add further secu d>>.**]**

31. **Data Security - Disposal**

When any employee perso or otherwise disposed of for any reason (including where co d are no longer needed), it should be securely deleted and information on the deletion and disposal of personal data, p any's Data Retention Policy.

32. **Data Security - Use of Pe**

The Company shall ensure ures are taken with respect to the use of employee personal

32.1 No employee perso d informally and if an employee, agent, contractor, n behalf of the Company requires access to any emp they do not already have access to, such access sh ted from <<insert name(s) and/or position(s) and cont

32.2 No employee pers sferred to any employee, agent, contractor, or other rties are working on behalf of the Company or not, ion of <<insert name(s) and/or position(s) and cont

32.3 Employee personal ith care at all times and should not

be left unattended d d employees, agents, contractors, or other parties at a

32.4 If employee person d on a computer screen and the computer in questio d for any period of time, the user must lock the comp aving it;

32.5 **[**Where employee p e Company is used for marketing purposes, it shall be nsert position>> to ensure that the appropriate consen no employee data subjects have opted out, whether y service such as the TPS;**]**

32.6 **[**<<Add further secu d>>.**]**

33. **Data Security - IT Securit**

The Company shall ensure sures are taken with respect to IT and information security:

33.1 All passwords used ersonal data should be changed regularly and shoul ses that can be easily guessed or otherwise compron must contain a combination of uppercase and low and symbols. **[**All software used by the Company is passwords.**]**;

33.2 Under no circumsta words be written down or shared between any empl ors, or other parties working on behalf of the Comp ority or department. If a password is forgotten, it must cable method. IT staff do not have access to password

33.3 All software (includi plications and operating systems) shall be kept up-to IT staff shall be responsible for installing any and dates **[**not more than <<insert period>> after the available by the publisher or manufacturer**]** **OR [** and practically possible**] [**, unless there are valid techn o**]**;

33.4 No software may b npany-owned computer or device without the prior ap partment or position>>;

33.5 **[**<<Add further secu d>>.**]**

34. **Organisational Measures**

The Company shall ensure ures are taken with respect to the collection, holding, and pro sonal data:

34.1 All employees, age r parties working on behalf of the Company shall be r their individual responsibilities and the Company's res a Protection Law and under this Policy, and shall be his Policy;

34.2 Only employees, ag er parties working on behalf of the Company that need mployee personal data in order to carry out their ass shall have access to employee personal data held

34.3 All sharing of emp hall comply with the information provided to the rele jects and, if required, the consent

of such data subjec or to the sharing of their personal data;

34.4 All employees, age r parties working on behalf of the Company handling will be appropriately trained to do so;

34.5 All employees, age r parties working on behalf of the Company handling will be appropriately supervised;

34.6 All employees, age r parties working on behalf of the Company handling shall be required and encouraged to exercise care, ca en discussing work-related matters that relate to employ er in the workplace or otherwise;

34.7 Methods of collecti sing employee personal data shall be regularly evaluat

34.8 All employee pers e Company shall be reviewed periodically, as set a Retention Policy;

34.9 The performance o nts, contractors, or other parties working on behalf o employee personal data shall be regularly evaluated

34.10 All employees, age r parties working on behalf of the Company handling ata will be bound to do so in accordance with th rotection Law and this Policy by contract;

34.11 All agents, contract orking on behalf of the Company handling employee nsure that any and all of their employees who are ng of employee personal data are held to the same o vant employees of the Company arising out of this Po Law;

34.12 Where any agent, c working on behalf of the Company handling employee heir obligations under this Policy, that party shall inde s the Company against any costs, liability, damages, ngs which may arise out of that failure;

34.13 **[**<<Add further orga equired>>.**]**

35. **Sharing Personal Data**

35.1 The Company may ersonal data with third parties if specific safeguards

35.2 Employee personal ed with other employees, agents, contractors, or othe alf of the Company if the recipient has a legitimate, job f any employee personal data is to be shared with a th of the European Economic Area, the provisions of Pa pply.

35.3 Where a third-part ed, that processor shall process personal data on (as data controller) only on the written instruction o

35.4 Employee personal d with third parties in the following circumstances:

a) the third pa d to know the information for the purpose of p Company under a contract;

b) the sharing al data concerned complies with the privacy r ected employee data subjects (see Part 15 fo nd, if required, the employees concerned h aring of their personal data;

c) the third-par to comply with all applicable data security sta rocedures, and has put in place adequate se ct the employee personal data;

d) (where appli lies with any cross-border transfer restrictions (

e) a fully exec containing GDPR-approved third party clause with the third-party recipient.

36. **Transferring Personal Da the EEA**

36.1 The Company ma nsfer ('transfer' includes making available remotely) to countries outside of the EEA.

36.2 The transfer of emp a country outside of the EEA shall take place only if on g applies:

a) the transfer or one or more specific sectors in that country organisation), that the European Commission s an adequate level of protection for personal

b) the transfer international organisation) which provides ap the form of a legally binding agreement ies or bodies; binding corporate rules; stand uses adopted by the European Commission proved code of conduct approved by a supervi formation Commissioner's Office); certification ification mechanism (as provided for in the G es agreed and authorised by the competent or provisions inserted into administrativ en public authorities or bodies authorised b sory authority;

c) the transfer med and explicit consent of the relevant emp

d) the transfer rmance of a contract between the employee da pany (or for pre-contractual steps taken at the data subject);

e) the transfer t public interest reasons;

f) the transfer uct of legal claims;

g) the transfer he vital interests of the employee data subject ere the employee data subject is physically or eir consent; or

h) the transfer er that, under UK or EU law, is intended to he public and which is open for

access by th therwise to those who are able to show a legiti g the register.

37. **Data Breach Notification**

37.1 All personal data mployee personal data must be reported immediate Protection Officer.

37.2 If an employee, ag r party working on behalf of the Company becomes that a personal data breach has occurred, they mus igate it themselves. Any and all evidence relating to ch in question should be carefully retained.

37.3 If a personal data b reach is likely to result in a risk to the rights and freed ubjects (e.g. financial loss, breach of confidentiality, d nal damage, or other significant social or economic ection Officer must ensure that the Information Commi med of the breach without delay, and in any event, w g become aware of it.

37.4 In the event that a p kely to result in a high risk (that is, a higher risk than th 37.3) to the rights and freedoms of employee data sul tion Officer must ensure that all affected employee rmed of the breach directly and without undue delay

37.5 Data breach notifica llowing information:

a) The categori ber of data subjects concerned;

b) The categor umber of personal data records concerned;

c) The name a Company's data protection officer (or other cor formation can be obtained);

d) The likely co h;

e) Details of t proposed to be taken, by the Company t n including, where appropriate, measures to erse effects.

38. **Implementation of Policy**

This Policy shall be deem ert date>>. No part of this Policy shall have retroactive effec ly to matters occurring on or after this date.

This Policy has been approved an

Name: <<insert

Position: <<insert

Date: <<insert

Due for Review by: <<insert

Signature: