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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 ghts of <<insert type(s) of data subject, e.g. staff, custome c.>> ("data subjects") in respect of their personal data under "Data Protection Law" means all legislation and regulations me regulating the use of personal data and the privacy of el s including, but not limited to, the retained EU law version o ection Regulation ((EU) 2016/679) (the "UK GDPR"), as it fo ngland and Wales, Scotland, and Northern Ireland by virtue ean Union (Withdrawal) Act 2018, the Data Protection Act and Electronic Communications Regulations 2003 as amen legislation.

This Policy sets the Com arding the collection, processing, transfer, storage, and disp The procedures and principles set out herein must be follow Company, its employees, agents, contractors, or other parties e 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 e(s) of data subject, e.g. staff, business contacts etc.>> used in for our commercial purposes;

"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;

"EEA" e 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" reach 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 ta, 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 c letter of the law, but also to the spirit of the law an ce 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 he Data Protection Officer is responsible for adm for developing and implementing any applicable relat 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 lement such practices, processes, controls, and trai ly necessary to ensure such compliance.

3.4 Any questions rela Data Protection Law should be referred to the Da n particular, the Data Protection Officer should alway lowing cases:

a) if there is an the lawful basis on which personal data is to be rocessed;

b) if consent is er to collect, hold, and/or process personal dat

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

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

e) if any assist aling with the exercise of a data subject's rig mited to, the handling of subject access requ

f) if a personal or actual) has occurred;

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

h) if personal d third parties (whether such third parties are a or data processors);

i) if personal d outside of the UK and there are questions re n which to do so;

j) when any s g activity is to be carried out, or significant c to existing processing activities, which will re mpact Assessment;

k) when perso or purposes different to those for which it was

l) if any autom g 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 UK GDPR sets out the following principles ndling personal data must comply. Data controllers are resp be able to demonstrate, such compliance. All personal da

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

4.2 collected for spec imate purposes and not further processed in a ma le 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 pu 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 t nal measures required by the UK 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 UK GDPR sets out the icable to data subjects:

5.1 The right to be infor

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 onal data shall be lawful if at least one of the following

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

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 mpliance 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 n 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:

a) the data sul licit consent to the processing of such data fo purposes (unless the law prohibits them from d

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 thorised by law or a collective agreement p ovides for appropriate safeguards for the funda sts of the data subject);

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 ortionate to the aim pursued, shall respect the e ta protection, and shall provide for suitable and safeguard the fundamental rights and interests

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 ursuant to a contract with a health professional ns and safeguards referred to in Article 9(3) o

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 a s or medical devices, on the basis of law which d specific measures to safeguard the rights ar subject (in particular, professional secrecy); or

j) the process rchiving purposes in the public interest, sc esearch purposes, or statistical purposes in le 89(1) of the UK GDPR (as supplemente ata Protection Act 2018) based on law which s o the aim pursued, respect the essence of ion, and provide for suitable and specific me he fundamental rights and the interests of t

7. **Consent**

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

7.1 Consent is a clea a 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 c hat personal data was originally collected that was a subject when they first provided their consent, cons e or purposes may need to be obtained from the d

7.5 **[**If special category ssed, the Company shall normally rely on a lawful bas nsent. If explicit consent is relied upon, the data sub e 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 ersonal data set out in Part 24 of this Policy. This incl

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

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

8.2 The Company only …and holds personal data for the specific purposes s…his Policy (or for other purposes expressly permitted…).

8.3 Data subjects must …times of the purpose or purposes for which the Comp… data. Please refer to Part 15 for more information or…nformed.

9. Adequate, Relevant, and …g

9.1 The Company will o…personal data for and to the extent necessary for the s…oses of which data subjects have been informed (or w…er Part 8, above, and as set out in Part 24, below.

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

9.3 Employees, agents…parties working on behalf of the Company may proc…when the performance of their job duties requires it. P…e Company cannot be processed for any unrelated re…

10. Accuracy of Data and Ke…

10.1 The Company shal…al data collected, processed, and held by it is kept ac…This includes, but is not limited to, the rectification of p…est of a data subject, as set out in Part 17, below.

10.2 The accuracy of pe…ecked when it is collected and at **[**regular**] OR [**<<ins…thereafter. If any personal data is found to be inacc… reasonable steps will be taken without delay to am…s appropriate.

11. Data Retention

11.1 The Company shall…for any longer than is necessary in light of the purpose…that personal data was originally collected, held, and…

11.2 When personal data…l reasonable steps will be taken to erase or otherwise d…y.

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 sha…sonal data collected, held, and processed is kept…against unauthorised or unlawful processing and ag…destruction, or damage. Further details of the techn…easures which shall be taken are

provided in Parts 25

12.2 All technical and or ken to protect personal data shall be regularly reviewe re their ongoing effectiveness and the continued secur

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

a) only those w ccess and use personal data and who are auth ess and use it;

b) personal da and suitable for the purpose or purposes for d, and processed; and

c) authorised u le to access the personal data as required for r purposes.

13. **Accountability and Recor**

13.1 The Data Protectior r administering this Policy and for developing and im ble related policies, procedures, and/or guidelines.

13.2 The Company shal sign approach at all times when collecting, holding, nal data. Data Protection Impact Assessments shall cessing presents a significant risk to the rights and fre (please refer to Part 14 for further information).

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 l records of all personal data collection, holding, 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 y collects, holds, and processes personal dat

c) the Compar es (including, but not limited to, consent, the ning such consent, and records of such consen and processing personal data;

d) details of t onal data collected, held, and processed b he categories of data subject to which that p

e) details of an ata to non-UK countries including all mechanis rds;

f) details of h will be retained by the Company (please refe Retention Policy);

g) details of pe…uding location(s);

h) detailed des…al and organisational measures taken by the…security of 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 perso…the use of new technologies and where the processi…sult in a high risk to the rights and freedoms of data su…

14.2 The principles of p…d be followed at all times when collecting, holding, …data. The following factors should be taken into consid…

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…d to the Company, including their likelihood an…

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

a) the type(s) o…e collected, held, and processed;

b) the purpose(…a is to be used;

c) the Compan…

d) how persona…

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

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

g) risks posed t…

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 subject:

a) where perso…ctly from data subjects, those data subjects will…e at the time of collection; and

b) where perso…m a third party, the relevant data subjects will…e:

i) if the…d to communicate with the data subje…nication 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 not limited to, contact details, and the names a applicable representatives and its Data Protect

b) the purpose al data is being collected and will be processe of this Policy) and the lawful basis justifying tha ng;

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

d) where the p ned directly from the data subject, the categorie cted and processed;

e) where the p transferred to one or more third parties, deta

f) where the p ansferred to a third party that is located outs of that transfer, including but not limited to the ee Part 31 of this Policy for further details);

g) details of ap eriods;

h) details of the der the UK GDPR;

i) details of th to withdraw their consent to the Company's p nal data at any time;

j) details of t to complain to the Information Commission

k) where the p ned directly from the data subject, details abou nal data;

l) where appli gal or contractual requirement or obligation ne n and processing of the personal data and det s of failing to provide it; and

m) details of a making or profiling that will take place using ding information on how decisions will be ma of those decisions, and any consequenc

16. Data Subject Access

16.1 Data subjects may uests ("SARs") at any time to find out more about the Company holds about them, what it is doing with that p

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 **[**and in accordance ta Subject Access Request Policy & Procedure**]**.

16.5 The Company does he handling of normal SARs. The Company reserves nable fees for additional copies of information that has o a data subject, and for requests that are manifestly , particularly where such requests are repetitive.

17. **Rectification of Personal**

17.1 Data subjects have e Company to rectify any of their personal data that is e.

17.2 The Company shall a in question, and inform the data subject of that recti n of the data subject informing the Company of the iss tended by up to two months in the case of complex re time is required, the data subject shall be informed.

17.3 In the event that data has been disclosed to third parties, those partie ny rectification that must be made to that personal dat

18. **Erasure of Personal Data**

18.1 Data subjects have the Company erases the personal data it holds about t umstances:

a) it is no long mpany to hold that personal data with respect hich it was originally collected or processed;

b) the data su w their consent to the Company holding and l data;

c) the data sub pany holding and processing their personal dat ding legitimate interest to allow the Company to e Part 21 of this Policy for further details conc ;

d) the personal d unlawfully;

e) the persona sed in order for the Company to comply with on**[**;**] OR [**.**]**

f) **[**the persona nd processed for the purpose of providing inf s to a child.**]**

18.2 Unless the Compa unds to refuse to erase personal data, all requests f mplied with, and the data subject informed of the era n of receipt of the data subject's request. The perio up to two months in the case of complex requests. required, the data subject shall be informed.

18.3 In the event that an … o be erased in response to a data subject's request h… ird parties, those parties shall be informed of the … impossible or would require disproportionate eff…

19. **Restriction of Personal D…**

19.1 Data subjects may … y ceases processing the personal data it holds abou… ect makes such a request, the Company shall reta… ersonal data concerning that data subject (if any) that… that the personal data in question is not processed fur…

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

20. **[Data Portability**

20.1 The Company proc… sing automated means. <<Insert details of automated…

20.2 Where data subject… nt to the Company to process their personal data in su… ocessing is otherwise required for the performance of… Company and the data subject, data subjects have … GDPR, to receive a copy of their personal data and t… es (namely transmitting it to other data controllers).

20.3 To facilitate the righ… Company shall make available all applicable personal… he following format**[**s**]**:

a) <<list format…

b) <<add furthe…

20.4 Where technically f… data subject, personal data shall be sent directly to th… r.

20.5 All requests for co… hall be complied with within one month of the data s… iod can be extended by up to two months in the case … requests. If such additional time is required, the data s…**]**

21. **Objections to Personal D…**

21.1 Data subjects hav… the Company processing their personal data base… s, for direct marketing (including profiling), **[**and proc… r historical research and statistics purposes**]**.

21.2 Where a data subje… ny processing their personal data based on its legitim… any shall cease such processing immediately, unless… d that the Company's legitimate grounds for such p… ata subject's interests, rights, and freedoms, or that th… y for the conduct of legal claims.

21.3 Where a data subje…ny processing their personal data for direct marketin…ny shall cease such processing promptly.

21.4 **[**Where a data subj…ny processing their personal data for scientific and/o…nd statistics purposes, the data subject must, under…trate grounds relating to his or her particular situation. …quired to comply if the research is necessary for the …carried out for reasons of public interest.**]**

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

22.1 **[**The Company use…mated decision-making processes as follows:

a) <<Insert deta…n-making>>.**]**

22.2 **[**The Company uses…ng purposes as follows:

a) <<Insert deta…>.**]**

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…r

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), data subj…ject, to challenge such decisions, request human inte…r own point of view, and to obtain an explanation of …Company. Data subjects must be explicitly informed o…nt of contact.

22.6 In addition to the a…must be provided to data subjects explaining the logi…ion-making or profiling, and the significance and env…f the decision or decisions.

22.7 When personal data…automated processing, automated decision-making, or…hall 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 25 to 30 of this Policy …data security and organisational measures).**]**

23. **[Direct Marketing**

23.1 The Company is su nd regulations when marketing its **[**products**] AND/OR**

23.2 The prior consent o red for electronic direct marketing including email, text ated telephone calls subject to the following limited exc

a) The Compa g text messages or emails to a customer pr mer's contact details have been obtained in the marketing relates to similar products or s er in question has been given the opportunity g when their details were first collected an mmunication from the Company.

23.3 The right to objec hall be explicitly offered to data subjects in a clear and must be kept separate from other information in ity.

23.4 If a data subject ob g, their request must be complied with promptly. A li al data may be retained in such circumstances to ensure that the data subject's marketing preferenc ed with.**]**

24. **Personal Data Collected,**

The following personal da d processed by the Company (for details of data retention, pl y's Data Retention Policy):

Data Ref.	**Type of Data**	
<<insert ref>>	<<insert data typ	e of data>>
<<insert ref>>	<<insert data typ	e of data>>
<<insert ref>>	<<insert data typ	e of data>>
<<insert ref>>	<<insert data typ	e of data>>
<<insert ref>>	<<insert data typ	e of data>>
<<insert ref>>	<<insert data typ	e of data>>
<<insert ref>>	<<insert data typ	e of data>>
<<insert ref>>	<<insert data typ	e of data>>
<<insert ref>>	<<insert data typ	e of data>>
<<insert ref>>	<<insert data typ	e of data>>

25. **Data Security - Transferri Communications**

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

25.1 All emails containin encrypted **[**using <<insert type(s) of encryption>>**]**;

25.2 All emails containin marked “confidential”;

25.3 Personal data may cure networks only; transmission over unsecured net any circumstances;

25.4 Personal data may r a wireless network if there is a wired alternative tha le;

25.5 Personal data cont email, whether sent or received, should be copied fr ail and stored securely. The email itself should be del associated therewith should also be deleted **[**using <<n>>**]**;

25.6 Where personal da csimile transmission the recipient should be informed mission and should be waiting by the fax machine to r

25.7 Where personal dat hardcopy form it should be passed directly to the reci <<insert name(s) and/or type(s) of delivery service>>**]**;

25.8 All personal data to y, whether in hardcopy form or on removable electroni red in a suitable container marked “confidential”;

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

26. Data Security - Storage

The Company shall ensure ures are taken with respect to the storage of personal data:

26.1 All electronic copi hould be stored securely using passwords and **[**<<i n>>**]** data encryption;

26.2 All hardcopies of p any electronic copies stored on physical, removable securely in a locked box, drawer, cabinet, or similar;

26.3 All personal data st be backed up <<insert interval>> with backups stor offsite**]**. All backups should be encrypted **[**using << on>>**]**;

26.4 No personal data s mobile device (including, but not limited to, laptops, t), whether such device belongs to the Company or o rmal written approval of <<insert name(s) and/or po tails>> and, in the event of such approval, strictly in ructions and limitations described at the time the a or no longer than is absolutely necessary**]**;

26.5 No personal data s ny device personally belonging to an employee, age party working on behalf of the Company and pers ansferred to devices belonging to agents, contractors on behalf of the Company where the party in questio ully with the letter and spirit of this Policy and of the ection Law (which may include demonstrating to th table technical and organisational measures have bee

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

27. **Data Security - Disposal**

When any personal data [illegible] rwise disposed of for any reason (including where copies ha[illegible] no longer needed), it should be securely deleted and dispo[illegible]nation on the deletion and disposal of personal data, please re[illegible]a Retention Policy.

28. **Data Security - Use of Pe[illegible]**

The Company shall ensure[illegible]ures are taken with respect to the use of personal data:

28.1 No personal data [illegible]ally and if an employee, agent, contractor, or other[illegible] of the Company requires access to any personal da[illegible]ady have access to, such access should be formally [illegible]t name(s) and/or position(s) and contact details>>;

28.2 No personal data [illegible]y employee, agent, contractor, or other party, whethe[illegible]ing on behalf of the Company or not, without the a[illegible] name(s) and/or position(s) and contact details>>;

28.3 Personal data must[illegible]t all times and should not be left unattended or on [illegible]mployees, agents, contractors, or other parties at any [illegible]

28.4 If personal data is [illegible]puter screen and the computer in question is to be le[illegible]iod of time, the user must lock the computer and scree[illegible]

28.5 Where personal da[illegible]is used for marketing purposes, it shall be the respons[illegible]n>> to ensure that the appropriate consent is obtained[illegible]s have opted out, whether directly or via a third-party s[illegible]

28.6 **[**<<Add further secu[illegible]d>>.**]**

29. **Data Security - IT Securit[illegible]**

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

29.1 All passwords used[illegible] should be changed regularly and should not use wo[illegible] be easily guessed or otherwise compromised. All p[illegible] a combination of uppercase and lowercase letters, n[illegible]All software used by the Company is designed to requi[illegible]

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

29.3 All software (includi[illegible]pplications and operating systems) shall be kept up-to[illegible] IT staff shall be responsible for installing any and[illegible]pdates **[**not more than <<insert

period>> after the … available by the publisher or manufacturer**] OR [** …and practically possible**] [**, unless there are valid techn… **]**];

29.4 No software may b… …mpany-owned computer or device without the prior app… …partment or position>>;

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

30. **Organisational Measures**

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

30.1 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;

30.2 Only employees, ag… …er parties working on behalf of the Company that need… …personal data in order to carry out their assigned dutie… …cess to personal data held by the Company;

30.3 All sharing of perso… …th the information provided to the relevant data subje… …onsent of such data subjects shall be obtained prior to… …onal data;

30.4 All employees, age… …r parties working on behalf of the Company handling … …ropriately trained to do so;

30.5 All employees, age… …r parties working on behalf of the Company handling … …ropriately supervised;

30.6 All employees, age… …r parties working on behalf of the Company handling… …e required and encouraged to exercise care, caut… …n discussing work-related matters that relate to perso… …orkplace or otherwise;

30.7 Methods of collecti… …ng personal data shall be regularly evaluated and revie…

30.8 All personal data h… …ll be reviewed periodically, as set out in the Company…

30.9 The performance o… …ents, contractors, or other parties working on behalf … …g personal data shall be regularly evaluated and revie…

30.10 All employees, age… …r parties working on behalf of the Company handling … …ound to do so in accordance with the principles of Da… …s Policy by contract;

30.11 All agents, contract… …orking on behalf of the Company handling personal d… …y and all of their employees who are involved in th… …nal data are held to the same conditions as those… …the Company arising out of this Policy and Data Pro…

30.12 Where any agent, c… …working on behalf of the Company handling personal … …tions under this Policy that party shall indemnify and… …mpany against any costs, liability,

damages, loss, clai may arise out of that failure;

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

31. **Transferring Personal Da the UK**

31.1 The Company may ansfer ('transfer' includes making available remotely) tries outside of the UK. The UK GDPR restricts suc ensure that the level of protection given to data subjec

31.2 Personal data may country outside the UK if one of the following applies

a) The UK has rming that the country in question ensures an ection (referred to as 'adequacy decisions' o . From 1 January 2021, transfers of personal EA countries will continue to be permitted. T e also in place to recognise pre-existing EU e UK.

b) Appropriate including binding corporate rules, standard co ed for use in the UK (this includes those adopte mission prior to 1 January 2021), an approved pproved certification mechanism.

c) The transfe rmed and explicit consent of the relevant data

d) The transfer he other reasons set out in the UK GDPR inclu of a contract between the data subject an blic interest reasons; for the establishme of legal claims; to protect the vital interests of the data subject is physically or legally incap r, in limited circumstances, for the Company's l

32. **Data Breach Notification**

32.1 All personal data b ed immediately to the Company's Data Protection Offi

32.2 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.

32.3 If a personal data b reach is likely to result in a risk to the rights and fre s (e.g. financial loss, breach of confidentiality, disc amage, or other significant social or economic dama n Officer must ensure that the Information Commi med of the breach without delay, and in any event, w g become aware of it.

32.4 In the event that a p kely to result in a high risk (that is, a higher risk than th 32.3) to the rights and freedoms of data subjects, the must ensure that all affected data subjects are informe and without undue delay.

32.5 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 including, where appropriate, measures to erse effects.

33. **Implementation of Policy**

This Policy shall be deem ert date>>. No part of this Policy shall have retroactive effec nly 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: