<<insert company name>>
Data Protection Policy

1. Introduction

This Policy sets out the [illegible] Company name>>, a company registered in <<insert cou[illegible]under number <<insert company registration number>>, w[illegible] is at <<insert address>> ("the Company") regarding data [illegible]s of its employees (in this context, "employee data subjects") [illegible]nal data under UK Data Protection Legislation (defined below).

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

2. Definitions

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

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

"data processor" [illegible] person or organisation which [illegible]ersonal data on behalf of a data

"Data Protection Legislat[illegible] [illegible] applicable data protection and [illegible] including, but not limited to, the [illegible] law version of the General Data [illegible]Regulation ((EU) 2016/679) (the [illegible]), as it forms part of the law of [illegible]d Wales, Scotland, and Northern [illegible]rtue of section 3 of the European [illegible]ndrawal) Act 2018, the Data [illegible] Act 2018, the Privacy and [illegible]ommunications Regulations 2003 [illegible], and any successor legislation;

“data subject” iving, identified, or identifiable bout whom the Company holds a (in this context, employee data

“EEA” European Economic Area, 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. **Data Protection Officer &**

3.1 The Company’s Da <<insert name of data protection officer>>, <<insert he Data Protection Officer is responsible **[**, wo <<insert department, e.g. HR Department, or posi **,]** for administering this Policy and for developing and cable related policies, procedures,

and/or guidelines.

3.2 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.

3.3 Any questions relat mpany's collection, processing, or holding of persona Protection Legislation should be referred to the Data

4. **The Data Protection Princ**

The Data Protection Legis ving principles with which anyone handling personal data mu ers are responsible for, and must be able to demonstrate, su nal data must be:

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 p rsonal data is processed. Personal data may be store ofar as the personal data will be processed solely f the public interest, scientific or historical research p rposes, subject to implementation of the appropriate te nal measures required by the Data Protection Legislati d the rights and freedoms of the data subject;

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

5. **The Rights of Data Subje**

The Data Protection Legis ving key rights applicable 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 king and profiling.

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

6.1 The Data Protecti o ensure that personal data is processed lawfully, y, without adversely affecting the rights of the data su ocessing of personal data shall be lawful only if at leas lies:

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 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 in addition to o ut above:

a) the data sub licit consent to the processing of such data fo urposes (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 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 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 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 Part 23 of this Polic

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 this Policy (or for other purposes expressly permitted egislation).

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 re 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 rmed as soon as is reasonably possible. The Com peration of its employees to help meet its obligations n Legislation.

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 the C ty Policy**]** **AND/OR [**IT Security Policy**]**.

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 Reco

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

13.2 The Company shal sign' approach at all times when

collecting, holding, ee personal data. Data Protection Impact Assessmer 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 Protection Legislation, this Policy, and all other applica

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 ch shall incorporate the following:

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 ses (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 an personal data to non-UK countries including all y safeguards;

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

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

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 ples, the Company shall carry out Data Protection Imp y and all new projects and/or new uses of employee olve the use of new technologies and where the proc o result in a high risk to the rights and freedoms of em

14.2 The principles of ' d 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 ir 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) c 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 ne data processing with respect to the purpose(ocessed;

g) risks posed s;

h) risks posed mpany; and

i) proposed m 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 e 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 in Part 23 of this Policy) and the lawful basis and processing;

c) where appli 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 25 of this Policy for further detail

g) details of ap eriods;

h) details of the s rights under the Data Protection Legislation;

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

j) details of t ject's right to complain to the Information

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 d do so 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… quire 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 ar… 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 dat… 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 employe… s to the Company holding and processing … there is no overriding legitimate interest to al… tinue 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… st, the Company shall retain only the amount of emp… ncerning that data subject (if any) that is necessary to … l 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 Data Protection copy of their personal data and to use it for other purp g it to other data 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 immedi demonstrated 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 the Data Protection Legislation, "demonstrate groun particular situation". The Company is not required to co ecessary for the performance of a task carried out for .

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

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

a) <<Insert outl... decision-making>>.**]**

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

a) <<Insert outl... tivities>>.**]**

22.3 The activities outli... d described in detail in <<insert location(s)>>) are g... er the Data Protection Legislation where the resulting ... similarly significant effect on data subjects unless one...

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 prev... s arising.**]**

23. **Personal Data**

The Company collects, hol... nal data about its employees at all times in accordance with... ects' rights and the Company's obligations under the Data ... d this Policy.

For details of data retentio... pany's Data Retention Policy.

Special Category Persona...

23.1 Any and all specia... ersonal data collected, held, and processed will be us... with the applicable conditions set

out in Part 6 of this

23.2 Special category pe essible and used only by <<insert department(s) and/ xtent strictly necessary to achieve the purpose(s) for v , and processed and shall not be revealed to other e actors, or other parties working on behalf of the Com tional circumstances where it is necessary to prote f the employee data subject(s) concerned, and suc he applicable conditions set out in Part 6 of this Policy)

Identification Information

23.3 The following identi e collected, held, and processed:

a) Name;

b) Contact Deta

c) <<add furthe

Employment Records

23.4 The following inform eld, and processed:

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

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

g) <<add furthe

Equal Opportunities Mon

23.5 Equal opportunitie n will be collected, held, and processed. Where p e anonymised. The Company will use special catego ual opportunities monitoring **[**only with employee data **[**on the lawful basis of <<insert lawful basis (as liste

23.6 Such data will only uired to reduce, stop, and prevent unlawful discrimina recruitment, promotion, training, development, asse rms of employment, redundancy, and dismissals are asis of capability, qualifications, experience, skills, a

23.7 Employees may re y does not hold such data about them. All requests n nd addressed to <<insert name(s) and/or position(s) a

23.8 The following inform eld, and processed:

a) Age;

b) Gender;

c) Ethnicity;

d) Nationality;

e) Religion;

f) <<add furthe

Health Records

23.9 Health information and processed. Most health data constitutes special onal data. The Company will use special category lth-related purposes **[**only with employee data sub he lawful basis of <<insert lawful basis (as listed in P

23.10 Health data will b extent required to ensure that employees are able rrectly, legally, safely, and without unlawful or unfair im tion.

23.11 Employees may re does not hold such data about them. All requests n nd addressed to <<insert name(s) and/or position(s) a

23.12 The following inform eld, and processed:

a) Details of sic

b) Medical con

c) Disabilities;

d) Prescribed m

e) <<add furthe

Benefits

23.13 If an employee is en e offered by the Company, it may be necessary for t to collect personal data from the employee. Any su e provided with the necessary information prior t ir data (as per the information requirements set ou).

23.14 The Company sha rsonal data except to the extent necessary for the a ant benefits schemes.

[Trade Union Data

23.15 The Company will p data about relevant employees to bona fide trade un Company). Most data about an employee's trade u titutes special category personal data. The Compan rposes **[**only with employee data subjects' consent**] C** f <<insert lawful basis (as listed in Part 6)>>**]**.

23.16 Employees may rec oes not supply their personal data to trade unions and right before any transfer is made.

23.17 The following inform

a) Name;

b) Job descript

c) <<insert type purpose>>;

d) <<add furthe

Employee Monitoring

23.18 The Company may tor employees' activities, such as internet and email eptional circumstances (such as criminal investigatio severity) justify covert monitoring, employees will be i monitoring in advance. Monitoring shall not normally in 's duties.

23.19 Monitoring will tak ompany considers it necessary. Personal data colle oses will only be collected, held, and processed for r , and necessary for, achieving the intended result. M e conducted in accordance with employees' rights u Legislation.

23.20 Intrusion upon em nunications and activities will be avoided whenever circumstances will monitoring take place outside of an e of work or working hours unless the employee is nent or other facilities such as Company email, i ovided by the Company for its employees.

24. **Sharing Personal Data**

24.1 The Company may personal data with third parties if specific safeguards

24.2 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 UK, the provisions of Part 25, below, shall also

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

24.4 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 n 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 execu ontaining data processing clauses compliant w Legislation has been entered into with the third

25. **Transferring Personal Da… the UK**

25.1 The Company may …ansfer ('transfer' includes making available remotely) …a to countries outside of the UK. The UK GDPR res… order to ensure that the level of protection given to … romised.

25.2 Employee personal …erred to a country outside the UK if one of the following …

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 emp…

d) The transfer … he other reasons set out in the UK GDPR inclu… a contract between the employee data subjec… public interest reasons; for the establishme… of legal claims; to protect the vital interests of … bject where the employee data subject is ph… ble of giving consent; or, in limited circumstanc… gitimate interests.

26. **Data Breach Notification**

26.1 All personal data … mployee personal data must be reported immediate… Protection Officer.

26.2 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.

26.3 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, … 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.

26.4 In the event that a p… kely to result in a high risk (that is, a higher risk than th… 26.3) to the rights and freedoms of employee data sub… tion Officer must ensure that all affected employee … rmed of the breach directly and without undue delay…

26.5 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.

27. **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: