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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 .>> ("data subjects") in respect of their personal data under D egislation and regulations in force from time to time regulatin data and the privacy of electronic communications including, egulation 2016/679 General Data Protection Regulation ("GD on Act 2018, and any successor legislation or other directly on relating to data protection and privacy for as long as, and v has legal effect in the UK).

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 parti of the Company, including when working from home.

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 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" European Economic Area,

all EU Member States, Iceland, and Norway;

"personal data" information relating to a data can be identified, directly or particular by reference to an ch as a name, identification tion data, an online identifier, or e factors specific to the physical, genetic, mental, economic, cial identity of that data subject;

"personal data breach" each of security leading to the r unlawful destruction, loss, nauthorised disclosure of, or ersonal data transmitted, stored, rocessed;

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

"pseudonymisation" ocessing of personal data in such t the personal data can no longer to a specific data subject without ditional information, provided that al information is kept separately t to technical and organisational ensure that the personal data is to an identified or identifiable n; and

"special category persona nal data revealing racial or ethnic ical opinions, religious or beliefs, trade union membership, ual 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 and e on the correct, lawful, and fair handling of all perso legal rights, privacy, and trust of all individuals with w

3.2 The Company rec working arrangements and, in particular, home wor oviding a better work life balance and safeguarding th employees, agents, contractors, or other parties wor working from home, it remains vitally important to rsonal data and the rights and privacy of individuals .

3.3 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.

3.4 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. Where priate, such measures and, in particular, training, s remotely to home workers.

3.5 Any questions rela Data Protection Law should be referred to the Da 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 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 there ar ng to the implementation and maintenance a home working environment;

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

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

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

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

m) if any autom g profiling or automated decision-making, is to

n) 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 wi dling 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 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 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 rsonal data is processed lawfully, fairly, and transpar affecting the rights of the data subject. Specifically processing of personal data shall be lawful if at least es:

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 pliance 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:

a) the data sub licit consent to the processing of such data fo purposes (the law prohibits them from doing s

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 sed law);

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 ditions and safeguards set out in Data Protect

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 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 wi shall be proportionate to the aim pursued, re he right to data protection, and provide for c measures to safeguard the fundamental of the data subject.**]**

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 o 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 c personal data for and to the extent necessary for the s oses of which data subjects have been informed (or w r 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 y. Further detail is provided in Part 27 of this Policy (in personal data for home workers) and in our Data Ret

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 aken 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 Reco**

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

13.2 The Company sha esign 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 al records of all personal data collection, holding, shall incorporate the following information:

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

13.5.2 the purpose y collects, holds, and processes personal dat

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

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

13.5.5 details of an ata to non-EEA countries including all mechanis rds;

13.5.6 details of ho… will be retained by the Company (please refer… Retention Policy);

13.5.7 details of pe… uding location(s);

13.5.8 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 i… 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 …

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 r… 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 … 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 Data Protection Law;

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

j) details of t… to complain to the Information Commission… ervisory authority" under Data Protection La…

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 ompany's Data Protection Officer.

16.5 All employees, age r parties working on behalf of the Company working f hat all personal data that they are working with is ke rever possible, only stored **[**and processed**]** within t name(s) and/or description(s) of system(s)>>**]** syste pid search and retrieval, and must fully cooperate fully ata Protection Officer in handling any SAR received w

16.6 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

17.4 All employees, age r parties working on behalf of the Company working f hat all personal data that they are working with is ke rever possible, only stored **[**and processed**]** within t name(s) and/or description(s) of system(s)>>**]** syst nable rapid and/or centralised rectification, and m the Company's Data Protection Officer in ensuring held by them at home is rectified within the time limit.

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 conce…;

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… of receipt of the data subject's request. The perio… up to two months in the case of complex requests. I… required, the data subject shall be informed.

18.3 In the event that an… 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…

18.4 All employees, age… parties working on behalf of the Company working f… hat all personal data that they are working with is ke… rever possible, only stored **[**and processed**]** within t… name(s) and/or description(s) of system(s)>>**]** syste… rapid and/or centralised erasure, and must coopera… any's Data Protection Officer in ensuring that any p… em at home is erased within the time limit.

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

19.3 All employees, age… parties working on behalf of the Company working f… hat all personal data that they are working with is ke… rever possible, only stored **[**and processed**]** within t… name(s) and/or description(s) of system(s)>>**]** syste… le the rapid and/or centralised application of restri… ate fully with the Company's Data Protection Officer in… onal data held by them at home is not processed furth… propriate, erasing such data from computers or device…

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 e Company and the data subject, data subjects have otection Law, to receive a copy of their personal data urposes (namely transmitting it to other data controller

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 a 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 o 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 pany 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 emonstrate grounds relating to his or her particular si is not required to comply if the research is necessa f a task carried out for reasons of public interest.**]**

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

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

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

22.2 **[**The Company uses ng 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), 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 en 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 c red for electronic direct marketing including email, tex ated telephone calls subject to the following limited exc

a) The Compa g text messages or emails to a customer p 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 dat 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 Employees, agents parties working on behalf of the Company working **[**should, whenever possible and practical,**]** only acc nal data when connected to the Company's Virtual P

25.3 All emails containin marked "confidential";

25.4 Personal data may cure networks only; transmission over unsecured n tted in any circumstances. All employees, agents parties working on behalf of the Company working f that their home network is secure at all times and tha reasonably possible, any and all security software or twork equipment such as modems and routers are i ssistance is available from the Company's **[**Data insert name of data protection officer>>, <<insert **D/OR [**IT Department, <<insert contact details>>**] A** s), position(s), department(s), and contact details as re

25.5 Personal data shou er a wireless network if there is a wired alternative tha le;

25.6 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>>**]**;

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

25.8 Where personal dat hardcopy form it should be passed directly to the reci <<insert name(s) and/or type(s) of delivery service>>**]**. be transferred to home workers in hardcopy form **[**exc stances.**]**;

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

25.10 **[**<<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 shall provide suitable storage equipment and/or f ees, agents, contractors, or other parties working on b orking from home who are likely to be processing perso

26.3 All personal data st be backed up <<insert interval>> using <<insert nam backup system>> with backups stored **[**onsite**] AN** ups should be encrypted **[**using <<insert type(s) of e

26.4 The storage of pers vices (including, but not limited to, laptops, tablets, a ner such device belongs to the Company or otherw o the extent absolutely necessary for the performanc Furthermore, employees, agents, contractors, or othe alf of the Company working from home **[**must**] OR [s** le and practical**]** only access and process personal o the Company's Virtual Private Network ("VPN");

26.5 Personal data may , stored on, accessed from, or processed on de nging to employees **[**with the authorisation of the ection Officer, only**]** to the extent absolutely necessar the relevant work, and only where the work in questio y a home worker. In the case of devices belonging t other parties working on behalf of the Company, pers ansferred to, stored on, accessed from, or processed ne party in question has agreed to comply fully with th s Policy and Data Protection Law (which may include ompany that all suitable technical

and organisational r en);

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

27. **Data Security - Disposal**

27.1 When any persona or otherwise disposed of for any reason (including w nade and are no longer needed), it should be securely

27.2 Personal data store e securely erased using <<insert name(s) and/or des nd/or standard(s)>>.

27.3 Personal data store uld be disposed of using <<insert name(s) and/or des nd/or standard(s)>>. Employees, agents, contractors king on behalf of the Company working from home personal data stored in hardcopy form at home if it is scribed above. If it is not possible to do so, such pers ined securely until it is possible to dispose of it in the , at the Company's premises and should under no cir of in normal household rubbish or recycling.

27.4 For further informat disposal of personal data, please refer to the Compar y.

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

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

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

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

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

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

28.5 All employees, age r parties working on behalf of the Company working f hat they use all reasonable efforts to comply with Parts cluding, for example, setting aside a specific room or p behind a lockable door, in a room with lockable windo articularly when handling personal data. The Company vorkers may not always be able to ensure a degree of the Company's premises, but all reasonably practica nade to ensure the best security possible in the circu

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

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

29. **Data Security - IT Securit**

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

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

29.2 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

29.3 All software (includi plications and operating systems) installed on IT equi Company shall be kept up-to-date **[**via remote admini y's IT staff. Any and all security-related updates sha e than <<insert period>> after the updates are made a or manufacturer**]** **OR [**as soon as reasonably and pra s there are valid technical reasons not to do so**]**;

29.4 All software (includi plications and operating systems) installed on IT e elonging to employees, agents, contractors, or othe half of the Company working from home should be ke me worker in question. **[**Software updates should be available or, as applicable, when automatically sched device in question.**]** **OR [**Software updates should be hen authorised by the Company's IT staff in order to e do not give rise to faults or errors. Automatic updates elayed wherever possible.**]** Advice and assistance is npany's **[**Data Protection Officer, <<insert name of r>>, <<insert contact details>>**]** **AND/OR [**IT Depa ct details>>**]** **AND/OR [**<<insert name(s), position(s) tact details as required>>**]**.

29.5 No software may b npany-owned computer or device without the prior ap tment, <<insert contact details>>**]** **AND/OR [**<<insert partment(s), and contact details as required>>**]**;

29.6 All employees, age r parties working on behalf of the Company working n personal data on IT equipment personally belongin advice on the installation of new software on their evices from the **[**IT Department, <<insert contact **[**<<insert name(s), position(s), department(s), and quired>>**]** before installing such software;

29.7 **[**<<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 those working from home) will be appropriately super thods;

30.6 All employees, age r parties working on behalf of the Company handling be 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 nts, 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 und 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 EEA**

31.1 The Company may …nsfer ('transfer' includes making available remotely) …s outside of the EEA.

31.2 The transfer of pers…utside of the EEA shall take place only if one or more …

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

31.2.2 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 Data P…ual clauses agreed and authorised by the com…ority; or provisions inserted into administrativ…en public authorities or bodies authorised b…sory authority;

31.2.3 the transfer …med and explicit consent of the relevant data …

31.2.4 the transfer …rmance of a contract between the data subject …for pre-contractual steps taken at the request …

31.2.5 the transfer i…t public interest reasons;

31.2.6 the transfer i…uct of legal claims;

31.2.7 the transfer i…e vital interests of the data subject or other ind…a subject is physically or legally unable to giv…

31.2.8 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.

32. **Data Breach Notification …**

32.1 All personal data b…ed immediately to the Company's Data Protection Off…nal data breaches which relate to personal data bein…es, agents, contractors, or other parties working on …from home, using either personal computers or device…he Company.

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 on 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:

32.5.1 The categori nber of data subjects concerned;

32.5.2 The catego umber of personal data records concerned;

32.5.3 The name a Company's Data Protection Officer (or other cor formation can be obtained);

32.5.4 The likely co h;

32.5.5 Details of t proposed to be taken, by the Company t n 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 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: