



## Data Protection Policy

### Executive Summary

The Data Protection Policy outlines Gamesley Community Group's (GCG) legal responsibilities as a *data controller* under the Data Protection Act 2018 and the UK GDPR. It sets out how the organisation collects, stores, uses, protects and disposes of personal data relating to staff, volunteers, trustees, job applicants, contractors and others connected to the organisation. Trustees are responsible for ensuring that the organisation meets its statutory obligations and upholds strong data protection standards.

### Purpose and Scope

The policy applies to all individuals working for or on behalf of GCG, including employees, volunteers, trustees, apprentices, consultants and former members of staff. It covers all personal data gathered throughout recruitment, employment, volunteering and service delivery. Separate privacy notices exist for clients, suppliers and additional categories of data subjects.

The policy defines personal data, special category data and what constitutes data processing. It also explains the six data protection principles – fairness, purpose limitation, data minimisation, accuracy, storage limitation, and security – which GCG is legally required to follow.

### Data Handling and Security

The organisation processes a wide range of personal information, including identification documents, employment details, performance records, health information, training data and IT system usage. Special category data (such as health or ethnicity data) is processed only when lawful to do so. Personal data must only be accessed by authorised individuals for legitimate organisational purposes, stored securely, kept accurate, and disposed of safely. Staff are required to use strong passwords, lock devices, avoid unauthorised sharing, and follow secure handling procedures for both electronic and paper data.

A Data Protection Officer (DPO) is appointed to oversee compliance, provide guidance, manage subject access requests and advise on security risks. Third-party processors such as HR providers, payroll firms and IT services must operate under strict confidentiality and contractual safeguards.

### Lawful Bases and Purposes for Processing

GCG processes personal data using lawful bases such as contractual necessity, legal obligations and legitimate interests. Data may be used for recruitment, payroll, performance management, safeguarding, training, health and safety, equal opportunities monitoring, disciplinary processes, pension administration, and organisational planning. Special category data is processed only when required by law, to protect vital interests, for occupational health purposes, or where explicit consent is provided.

### Data Subject Rights

Individuals have rights to access, correct, restrict, erase or transfer their personal data, and to object to certain types of processing. They may also make subject access requests (SARs), to which GCG must respond within one month. The organisation must ensure that individuals are informed of how their data is used and must not penalise anyone for exercising their rights.

## **Data Breaches**

The organisation has measures in place to prevent data breaches. Any breach must be reported immediately to the DPO, and evidence must be preserved. Where a breach poses a risk to individuals' rights or freedoms, the Information Commissioner's Office (ICO) must be notified within a strict timeframe. Serious breaches may also require informing the affected individuals.

## **Retention and Disposal**

Part 2 of the policy sets out detailed data retention periods, based on statutory requirements and best practice, covering employment records, payroll information, health records, accident reports, pension documents, and more. GCG must retain data only for as long as necessary and dispose of it securely, with deletion, archiving or anonymisation used appropriately.

## **Governance and Compliance**

Trustees are accountable for ensuring the organisation complies with the law, maintains robust security measures, monitors data handling practices and periodically reviews the policy. Staff non-compliance may lead to disciplinary action, including dismissal, and certain actions (such as destroying data relevant to a SAR) may constitute criminal offences.

## Introduction

This policy is intended to meet the requirements of the Data Protection Act (2018) and the EU General Data Protection Regulations (GDPR) and comply with our legal obligations in respect of data privacy and security.

We are a 'data controller' for the purposes of your personal data. This means that we determine the purpose and means of processing your personal data.

We have appointed **[insert DPO here]** as the person with responsibility for our data protection compliance. They should be contacted concerning questions or requests for further information about this policy.

This policy explains how we will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing, or storing personal data in the course of working for or on our behalf.

## Purpose and Scope

We take the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. We have a duty to notify you of the information contained in this policy.

This policy applies to current and former employees, workers, volunteers, apprentices, consultants, trustees, and job applicants. If you fall into one of these categories then you are a 'data subject' for the purposes of this policy. You should read this policy alongside your contract of employment for (contract for services) and any other notice we issue to you from time to time in relation to your data.

We have separate policies and privacy notices in place in respect of customers, suppliers, and other categories of data subject. A copy of these can be obtained from **[DPO]**.

We will hold data for specified periods of time appropriate to the type of data. These periods of time are contained in Part 2 Of this policy. We will only hold data for as long as necessary for the purposes for which we collected it.

We have measures in place to protect the security of your data in accordance with our Data Security Policy. These security measures are contained in Part 3 of this policy.

## Part 1 - Data Protection Principles

Personal data must be processed in accordance with six 'data protection principles'. It must:

- be processed fairly, lawfully, and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant, and limited to what is necessary for the purposes for which it is processed,
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

## **Defining Personal Data**

'Personal data' means information which relates to a living person who can be identified from that data (a 'data subject') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of our intentions or those of others in respect of that person. It does not include anonymised data.

This policy applies to all personal data whether it is stored electronically, on paper or on other materials.

This personal data might be provided to us by you or someone else (such as a former employer, your doctor, or a credit reference agency), or we could create it. It could be provided or created during the recruitment process or during the course of the contract of employment or services) or after its termination. It could be created by your manager or other colleagues.

We will collect and use the following types of personal data about you:

- Recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies, and details of any pre-employment assessments.
- Your contact details and date of birth.
- The contact details of your emergency contacts.
- Your tender.
- Your marital status and family details.
  
- Information about your contract of employment (or services including start and end dates of employment, role and location, working hours, details of promotion, salary including details of previous remuneration), pension, benefits, and holiday entitlement.
- Your bank details and information in relation to your tax status including your National Insurance number.
- Your identification documents including passport and driving licence, and information in relation to your immigration status and right to work for us.
- Information relating to disciplinary or grievance investigations and proceedings involving you, whether or not you were the main subject of those proceedings.
- Information relating to your performance and behaviour at work,
- Absence records.
- Training records.
- Electronic information in relation to your use of IT systems/swipe cards/telephone systems.
- Your images, whether captured on CCTV, by photograph or video.
- Information about your termination of employment (or services) including resignation, dismissal and redundancy letters, minutes of meetings, settlement agreements, and other related correspondence.
- Data or images obtained from organisation vehicles fitted with trackers, dash cams, or any other related device.
- Any other category of personal data which we may notify you of from time to time.

## **Defining Special Categories of Personal Data**

'Special categories of personal data' are types of personal data consisting of information as to:

- your racial or ethnic origin;
- your political opinions,
- your religious or philosophical beliefs,
- your trade union membership,
- your genetic or biometric data;
- your health;
- your sex life and sexual orientation, and
- any criminal convictions and offences.

We may hold and use any of these special categories of your personal data in accordance with the law.

## **Defining Processing**

'Processing' means any operation which is performed on personal data such as:

- Collection, recording, organisation, structuring or storage.
- Adaption or alteration.
- Retrieval, consultation or use.
- Disclosure by transmission, dissemination or otherwise making available.
- Alignment or combination.
- Restriction, destruction or erasure.

This includes processing personal data which forms part of a filing system and any automated processing,

## **Data Security**

We take the security of HR related personal data seriously. We have internal policies and controls in place to protect personal data against loss, accidental destruction, misuse, or disclosure, and to ensure that data is not accessed except by employees in the proper performance of their duties. A Data Security Policy is contained in Part 3.

Where we engage third parties to process personal data on our behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## **How Personal Data Will Be Processed**

We will process your personal data, including special categories of personal data, in accordance with our obligations under the 2018 Act.

We will use your personal data on a lawful basis for

- **Contractual**  
Performing the contract of employment (or services) between us.
- **Legal Obligation**  
Complying with any legal obligation.
- **Legitimate Interest**

If it is necessary for our legitimate interests, or for the legitimate interests of someone else. However, we can only do this if your interests and rights do not override ours, or theirs. You have the right to challenge our legitimate interests and request that we stop this processing.

We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

If you choose not to provide us with certain personal data you should be aware that we may not be able to carry out certain parts of the contract between us. For example, if you do not provide us with your bank account details we may not be able to pay you. It might also stop us from complying with certain legal obligations and duties which we have such as to pay the right amount of tax to HMRC or to make reasonable adjustments in relation to any disability you may suffer from.

### **Reasons for Processing Personal Data**

We have to process your personal data in various situations during your recruitment, employment (or engagement), and even following termination of your employment (or engagement).

For example, in the following circumstances:

- To decide whether to employ (or engage) you.
- To decide how much to pay you, and the other terms of your contract with us.
- To check you have the legal right to work for us.
- To carry out the contract between us including, where relevant, its termination,
- To decide whether to promote you.
- To carry out a disciplinary or grievance investigation or procedure in relation to you or someone else.
- To monitor and protect the security(including network security) of ourselves, of you, our other employees, customers, and others.
- Paying tax and National Insurance.
- To provide a reference upon request from another employer.
- To run our business and plan for the future.
- To prevent and detect fraud or other criminal offences.

We might process special categories of your personal data specifically for the following purposes

- To train and review your performance.
- To decide whether and how to manage your performance, absence or conduct.
- To determine whether we need to make reasonable adjustments to your workplace or role because of your disability.
- To monitor diversity and equal opportunities.
- To monitor and protect your health and safety, and the health and safety of our other employees, customers and third parties.
- To pay you and provide pension and other benefits in accordance with the contract between us.
- To monitor compliance by you, us and others with our policies and our contractual obligations.
- To comply with employment law, immigration law, health and safety law, tax law and other laws which affect us.
- To answer questions from insurers in respect of any insurance policies which relate to you.
- To defend us in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure.
- For any other reason which we may notify you of from time to time.

We will only process special categories of your personal data in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we asked for your consent to process a special category of personal data then we would explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose by contacting **[DPO]**

We do not need your consent to process special categories of your personal data when we are processing it for the following purposes, which we may do

- Where it is necessary for carrying out rights and obligations under employment law.
- Where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent.
- Where you have made the data public.
- Where processing is necessary for the establishment, exercise or defence of legal claims.
- Where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity.

We might process special categories of your personal data for the purposes above. In particular, we will use information in relation to:

- Your race, ethnic origin, religion, sexual orientation, or gender to monitor equal opportunities.
- Whether you have a disability which we need to make reasonable adjustments for.
- Your sickness absence, health and medical conditions to monitor your absence, assess your fitness for work, to pay you benefits, to comply with our legal obligations under employment law including to make reasonable adjustments and to look after your health and safety.

We do not take automated decisions about you using your personal data or use profiling in relation to you or your employment. However, you will be notified if this position changes.

## **Sharing Personal Data**

Sometimes we might share your personal data with group companies, third parties, agents and/or contractors to carry out our obligations under our contract with you or for our legitimate interests.

We also share your data with third parties that process data on our behalf, in connection with payroll, the provision of benefits and the provision of occupational health services. We also share your data with outsourced employment law and HR services to ensure compliance with employment legislation.

We require those companies to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

We will not transfer your data to countries outside the EEA. If this changes you will be notified of this and the protections which are in place to protect the security of your data will be explained.

## **Processing Personal Data for the Organisation by You**

Everyone who works for or on our behalf has some responsibility for ensuring data is collected,

stored and handled appropriately in line with this policy and our data security and data retention policies.

**[DPO]** is responsible for reviewing this policy and updating the board of directors on our data protection responsibilities and any risks in relation to the processing of data. You should direct any questions in relation to this policy or data protection to this person.

- You should only access personal data covered by this policy if you need it for the work you do for or on our behalf and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained.
- You should not share personal data informally.
- You should keep personal data secure and not share it with unauthorised people.
- You should regularly review and update personal data which you have to deal with for work. This includes telling us if your own contact details change.
- You should not make unnecessary copies of personal data and should keep and dispose of any copies securely.
- You should use strong passwords.
- You should lock your computer screens when not at your desk.
- Personal data should be encrypted where available or password protected before being transferred electronically to authorised external contacts. Speak to IT or your line manager for more information on how to do this.
- Consider anonymising data or using separate keys/codes so that the data subject cannot be identified.
- Do not save personal data to your own personal computers or other devices.
- Personal data should never be transferred outside the EEA except in compliance with the law and authorisation of **[DPO]**.
- You should lock drawers and filing cabinets. Do not leave paper with personal data lying about.
- You should not take personal data away from our premises without authorisation from your line manager.
- Personal data should be shredded and disposed of securely when you have finished with it.

You should ask for help from **[DPO]** if you are unsure about data protection or if you notice any areas of data protection or security we can improve on.

Any deliberate or negligent breach of this policy by you may result in disciplinary action being taken in accordance with our Disciplinary and Dismissal Policy.

It is a criminal offence to conceal or destroy personal data which is part of a subject access request. This conduct would also amount to *gross misconduct* under our disciplinary procedure which could result in your dismissal.

## **Data Breaches**

We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur, whether in respect of you or someone else, then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals then we must also notify the Information Commissioners Office (ICO) within 2 hours.

If you are aware of a data breach you must contact **[DPO]** immediately and keep any evidence you have in relation to the breach.

## **Subject Access Request (SAR)**

Data subjects can make a SAR to find out the information we hold about them. This request must be made in writing. If you receive such a request you should forward it immediately to **[DPO]** who will coordinate a response.

If you would like to make a SAR in relation to your own personal data you should make this in writing to **[DPO]**. We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.

There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request.

## **Data Subject Rights**

You have the right to information about what personal data we process, how and on what basis as set out in this policy.

You have the right to access your own personal data by way of a SAR.

You can correct any inaccuracies in your personal data. To do this you should contact **[DPO]**.

You have the right to request that we erase your personal data where we were not entitled under the law to process it, or it is no longer necessary to process it for the purpose it was collected. To do so you should contact **[DPO]**.

While you are requesting that your personal data is corrected or erased or are contesting the lawfulness of our processing you can apply for its use to be restricted while the application is made. To do so you should contact **[DPO]**.

You have the right to object to data processing where we are relying on a legitimate interest to do so, and you think that your rights and interests outweigh our own and you wish us to stop.

You have the right to object if we process your personal data for the purposes of direct marketing.

You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.

With some exceptions, you have the right not to be subjected to automated decision making.

You have the right to be notified of a data security breach concerning your personal data.

In most situations we will not rely on your consent as a lawful ground to process your data. If we do, however, request your consent to the processing of your personal data for a specific purpose you have the right not to consent or to withdraw your consent later. To withdraw your consent you should contact **[DPO]**.

You have the right to complain to the ICO, you can do this by contacting the ICO directly. Full contact details including a helpline number can be found on the ICO website: [www.ico.org.uk](http://www.ico.org.uk) This website has further information on your rights and our obligations.

## **Part 2 - Data Retention Policy**

Personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose.

We will therefore:

- review the length of time we keep personal data;
- consider the purposes we hold the information for in deciding whether, and for how long, to retain it,
- securely delete information that is no longer needed for this purpose; and
- update, archive or securely delete information if it goes out of date.

### **Deleting Data**

Discarding data too soon would be likely to disadvantage us and, quite possibly, inconvenience the people the information is about as well.

Personal data will be regularly reviewed, and anything no longer needed will be deleted. Information that does not need to be accessed regularly, but which still needs to be retained, will be safely archived or put offline.

In retaining data we will take account of any professional rules or regulatory requirements that apply. The retention periods will be regularly reviewed to consider whether it is being held for too long or conversely if it is being deleted prematurely. However, if any records are not being used, consideration will be given to whether they need to be retained.

### **Personal Data at the end of Its Retention Period**

At the end of the retention period, or the life of a particular record, it will be reviewed and deleted unless there is some special reason for keeping it.

Where appropriate a record may not be permanently deleted, and it may be archived instead. If a record is archived or stored offline this will reduce its availability and the risk of misuse or mistake. However, a record will only be archived, rather than deleted, if it is considered essential to retain it. To comply with data protection principles subject access to it will still be permissible. If a record is deleted from a live system it will also be deleted from any back-up of the information on that system.

### **Data Retention Periods**

We will hold data for as long as necessary for the purposes for which we collected it and will hold data for specified periods of time appropriate to the type of data.

The main UK legislation regulating statutory retention periods is summarised below. If we are in doubt, we will retain records for at least 6 years (5 in Scotland) to cover the time limit for bringing any civil legal action.

- Accident Books, accident records/reports

Statutory retention period 3 years from the date of the last entry (or if the accident involves a child/young adult, then until that person reaches the age of 21).

- Accounting records  
Statutory retention period 3 years for private companies, 6 years for public limited companies.
- Coronavirus furlough records  
Statutory retention period: 6 years for furlough records including amounts claimed, claim period per employee, reference number and calculations.
- Income tax and NI returns, income tax records and correspondence with HMRC  
Statutory retention period not less than 7 years after the end of the financial year to which they relate..
- Medical records and details of biological tests under The Control of Lead at Work Regulations  
Statutory retention period 40 years from the date of the last entry.
- Medical records as specified by The Control of Substances Hazardous to Health Regulations (COSHH)  
Statutory retention period 40 years from the date of the last entry.
- Medical records under The Control of Asbestos at Work Regulations  
Statutory retention period 40 years from the date of the last entry for medical records, 4 years from the date of issue for medical examination certificates.
- Medical records under The Ionising Radiations Regulations  
Statutory retention period: until the person reaches 75 years of age, but in any event for at least 50 years.
- National minimum wage records  
Statutory retention period 6 years after the end of the pay reference period following the one that the records cover.
- Payroll wage/salary records (also overtime, bonuses, expenses)  
Statutory retention period: 6 years from the end of the tax year to which they relate.
- Records of tests and examinations of control systems and protective equipment under The Control of Substances Hazardous to Health Regulations (COSHH)  
Statutory retention period 5 years from the date on which the tests were carried out.
- Records relating to children and young adults  
Statutory retention period until the child/young adult reaches the age of 21.
- Retirement benefits schemes  
Statutory retention period: 6 years from the end of the scheme year in which the event took place.
- Statutory maternity pay records including MAT B1s (also shared parental, paternity and adoption pay records)  
Statutory retention period: 3 years after the end of the tax year in which the maternity period ends.
- Working time records including overtime, annual holiday, time off for dependants etc.  
Statutory retention period 2 years from the date on which they were made.

For many types of HR records there is no definitive retention period, therefore it is up to us to

decide how long to keep them. We have therefore considered the necessary retention period for them, depending on the type of record.

The retention periods listed below are based on the time limits for potential UK tribunal or civil claims.

The UK Limitation Act 1980 contains a 6 year time limit for starting many legal proceedings. So, where documents may be relevant to a contractual claim, we will retain them for at least a corresponding 6 year period.

- Actuarial valuation reports

Recommended retention period: permanently.

- Application forms and interview notes (for unsuccessful candidates)

Recommended retention period: 12 months.

- Assessments under health and safety regulations and records of consultations with safety representatives and committees

Recommended retention period: permanently.

- Inland Revenue/HMRC approvals

Recommended retention period: permanently.

- Money purchase details

Recommended retention period: 6 years after transfer or value taken.

- Parental leave

Recommended retention period 5 years from birth/adoption of the child or 18 years if the child receives a disability allowance.

- Pension records

Recommended retention period: 12 years after the benefit ceases.

- Pension scheme investment policies

Recommended retention period: 12 years from the ending of any benefit payable under the policy.

- Personnel files and training records (including disciplinary and working time records)

Recommended retention period: 6 years after employment ceases.

- Redundancy details, calculations of payments, refunds, notification to the Secretary of State

Recommended retention period: 6 years from the date of redundancy.

- Senior executives' records (senior management team or equivalents) Recommended retention period: permanently for historical purposes.

- Statutory Sick Pay (SSP) records, calculations, certificates, self-certificates, occupational health reports

Recommended retention period: 6 years after employment ceases.

- Time cards

Recommended retention period: 2 years after audit.

- Trade union agreements

Recommended retention period: 10 years after ceasing to be effective.

- Trust deeds and rules

Recommended retention period: permanently.

- Trustees' minute books

Recommended retention period: permanently.

- Works council minutes

Recommended retention period: permanently.

### **Part 3 - Data Security Policy**

#### **Introduction**

This policy outlines behaviours expected of employees when dealing with data and provides a classification of the types of data with which they should be concerned.

As an employee of the organisation, if you have access to data then you must protect personal, restricted, confidential, and sensitive data and ensure it is processed in accordance with the data protection principles contained in Part 1 of this policy and further detailed below.

Any employee, contractor or individual with access to our systems and personal data. The definition of data to be protected is defined as all data that is described in Part 1 of this policy.

#### **Data Protection Principles**

The following provides further detail to the data protection principles stated in part 1 of this policy.

Employees whose work involves using and/or processing data subjects must comply with this policy and with the six legal data protection principles which require that personal information be:

- Processed fairly and lawfully and in a transparent manner in relation to individuals.
- We must always have a lawful basis to process personal information. In most, but not all, cases the person to whom the information relates (the 'subject') must have given consent. The subject must be told who controls the information (us), the purpose(s) for which we are processing the information and to whom it may be disclosed.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes, further processing for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date, every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which that are processed, are erased or rectified without delay ('accuracy').
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes subject to implementation

of the appropriate technical and organisational measures required by the GDPR to safeguard the rights and freedoms of individuals ('storage limitation'). For guidance on how long particular information should be kept, contact **[DPO]**.

- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures to ensure integrity and confidentiality.

In addition to the above, some personal information needs even more careful handling. This includes information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life and sexual orientation; and any criminal convictions and offences.

## **Employee Requirements**

You must protect personal information in our possession from being accessed, lost, deleted or damaged unlawfully or without proper authorisation through the use of data security measures.

Maintaining data security means making sure that

- only employees who are authorised to use the information can access it;
- information is accurate and suitable for the purpose for which it is processed, and
- authorised persons can access information if they need it for authorised purposes.

Personal information, therefore, should not be stored on individual computers but instead on our central system.

We, by law, must use procedures and technology to secure personal information throughout the period that we hold or control it; from obtaining to destroying the information.

Personal information must not be transferred to any person to process, e.g. while performing services for us on our behalf, unless that person has either agreed to comply with our data security procedures or we are satisfied that other adequate measures exist.

Security procedures include:

- Physically securing information

Any desk or cupboard containing confidential information must be kept locked. Computers should be locked with a password or shut down when they are left unattended, and discretion should be used when viewing personal information on a monitor to ensure that it is not visible to others.

- Controlling access to premises

You should report to security if you see any person you do not recognise in an entry- controlled area.

- Telephone precautions

Particular care must be taken by employees who deal with telephone enquiries to avoid inappropriate disclosures. In particular:

- the identity of any telephone caller must be verified before any personal information is disclosed
- if the caller's identity cannot be verified satisfactorily, then they should be asked to put their query in writing, and
- do not allow cashiers to bully you into disclosing information. In case of any problems or uncertainty, contact **[DPO]**.

- Methods of disposal

Copies of personal information, whether on paper or on any physical storage device, must be physically destroyed when they are no longer needed. Paper documents should be shredded and CD's or memory sticks, or similar, must be rendered permanently unreadable.