

## Data protection policy

### Context and overview

#### Introduction

Powder Blue Limited needs to gather and use certain information about individuals. These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards – and to comply with the law.

#### Why this policy exists

This data protection policy ensures Powder Blue Limited:

- Complies with data protection law and follow good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individual's data
- Protects itself from the risks of a data breach

#### Data protection law

The Data Protection Act 1998 describes how organisations – including Powder Blue Limited – must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that

Personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects

7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

## People, risks and responsibilities

### Policy scope

This policy applies to:

- The Head office of Powder Blue Limited
- All Branches of Powder Blue Limited
- All staff and volunteers of Powder Blue Limited
- All contractors, suppliers and other people working on behalf of Powder Blue Limited

It applies to all data that the company holds relating to individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of individuals
- Postal Addresses
- Email addresses
- Telephone numbers
- ...plus any other information relating to individuals

### Data protection risks

This policy helps to protect Powder Blue Limited from some very real security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

### Responsibilities

Everyone who works for or with Powder Blue Limited has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The **board of directors** is ultimately responsible for ensuring that Powder Blue Limited meets its legal obligations.
- The data protection officer is responsible for:
  - Keeping the board updated about data protection responsibilities, risks and issues.
  - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
  - Arranging data protection training and advice for the people covered by this policy.
  - Handling data protection questions from staff and anyone else covered by this policy.

- Dealing with requests from individuals to see the data Powder Blue Limited holds about them (also called 'subject access requests').
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- The IT Manager is responsible for:
  - Ensuring all systems, services and equipment used for storing data meets acceptable security standards.
  - Performing regular checks and scans to ensure security hardware and software is functioning properly.
  - Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- The marketing manager is responsible for:
  - Approving any data protection statements attached to communications such as emails and letters
  - Addressing any data protection queries from journalists or media outlets like newspapers.
  - Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

## Data Breaches

- The GDPR introduces a duty on all organisations to report certain types of personal data breach to the relevant supervisory authority. We will do this within 72 hours of becoming aware of the breach, where feasible.
- If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we will also inform those individuals without undue delay.
- We will ensure we have robust breach detection, investigation and internal reporting procedures in place. This will facilitate decision-making about whether or not we need to notify the relevant supervisory authority and the affected individuals.
- We will also keep a record of any personal data breaches, regardless of whether we are required to notify.
- We will inform clients when we become aware of a data breach of their data. It will then become the client's responsibility to report the breach to the relevant authority.

## General staff guidelines

- The only people able to access data covered by this policy should be those who **need it for their work**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line managers.
- **Powder Blue Limited will provide training** to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guideline below.
- In particular, **strong passwords must be used** and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within the company or externally.
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer require, it should be deleted and disposed of.
- Employees **should request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection.

## Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a **locked drawer or filing cabinet**.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's standard backup procedure.
- Data should **never be saved directly** to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

## Data use

Personal data is of no value to Powder Blue Limited unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be **encrypted before being transferred electronically**. The IT manager can explain how to send data to authorised external contacts.
- Personal data should **never be transferred outside of the European Economic Area**.
- Employees **should not save copies of personal data to their own computers**. Always access and upload the central copy of any data.

## Data accuracy

The law require Powder Blue Limited to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Powder Blue Limited should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in **as few places as necessary**. Staff should not create unnecessary additional data sets.
- Staff should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.
- Powder Blue Limited will make it **easy for data subjects to update the information** Powder Blue Limited holds about them. For instance, via the company website.
- Data should be **updated as inaccuracies are discovered**. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the marketing manager's responsibility to ensure **marketing databases are checked against industry suppression files** every six months.

## Subject access requests

All individuals who are the subject of personal data held by Powder Blue Limited are entitled to:

- Ask **what information the company holds about them and why**.
- Ask **how to gain access to it**.
- Be informed **how to keep it up to date**.
- Be informed how the company is **meeting its data protection obligations**.

If an individual contacts the company requesting this information, this is called a subject access request. Subject access requests from individuals should be made by email, addressed to [sales@seetheworld.com](mailto:sales@seetheworld.com). The company can provide a standard request form, although individuals do not have to use this.

Individuals will be charged at our normal hourly rate per subject access request and Powder Blue Limited will aim to provide the relevant data within 14 days. Powder Blue Limited will always verify the identity of anyone making a subject access request before handing over any information.

Subject access requests for data owned by Powder Blue Limited's web clients must be made directly through the client. Subject access requests for web client owned data will be charged at our normal hourly rate.

## Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Powder Blue Limited will disclose requested data. However, the data controller will ensure the request is legitimate, seeking reassurance from the board and from the company's legal advisers where necessary.

## Providing information

Powder Blue Limited aims to ensure that individuals are aware their data is being processed, and that they understand:

- How data is being used

- How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.