

Policies

1. Data Protection Policy

From May 2018, the data protection regime in the UK has been subject to the General Data Protection Regulation (GDPR) legislation enacted by the European Union (EU), together with the UK-specific Data Protection Act 2018 (DPA 2018). The regime covers the protection of Personal Data held by individuals, businesses and organizations on individuals, including clients and suppliers.

Personal Data

This is defined by the GDPR as information that relates to an identified or identifiable individual such as a name, a location address (geographical, email or IP), an identifier, or a telephone number. Information about companies or public authorities is not Personal Data. Significantly for this business, information that relates to a deceased person does not constitute Personal Data and therefore is not subject to the GDPR and is excluded from this policy.

Roles

As a Sole Trader I identify myself on behalf of my business, under the terms of the GDPR, as:

- the Data Controller - I determine the purposes and means of processing Personal Data
- the Data Processor - I am responsible for processing Personal Data

Privacy Information

The GDPR requires that individuals with whom I deal must be informed about the collection and use of their Personal Data. This is called Privacy Information and incorporates the following points:

1. The purposes for processing Personal Data

- I will collect process and hold Personal Data provided by an individual to enable contact between myself and that individual, or to act as their agent to interact with a third party and with the individual's prior agreement. This includes Personal Data on other living persons provided by an individual, or discovered during research on behalf of a client.
- I will minimise the Personal Data I collect, process and hold on an individual to that which is relevant to my business processes and will periodically check whether the Personal Data is still required by me, deleting it if it is not.
- Any individual may contact me to request what Personal Data I hold on them and ask for it to be amended, corrected by new information provided by them, or deleted. I will comply with such a request within five working days.

2. Retention periods for Personal Data

- All Personal Data held by me will be retained for two years and will be stored either in a locked cabinet, or on a password-protected digital device and backed up online securely.

3. Sharing of Personal Data

- I will not disclose any Personal Data I collect, process or hold to a third party, except as above, unless legally obliged to do so.
- I will respect your privacy and am committed to safeguarding your personal data.

END

2. Information Security Policy

I will put in place or arrange appropriate, pragmatic and cost-effective security solutions in order to prevent Personal Data that I collect, process or hold from being accidentally or intentionally amended, deleted or stolen. This relates both to digital security (digital devices and online services) as well as physical documents.

I will hold the Personal Data of individuals on a digital device which will be password-protected and additionally protected from external attack by the adoption of anti-virus/malware software. The Personal Data will be backed up to an online service protected by password access.

I will hold all physical documents containing Personal Data in a locked cabinet.

END