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1. Introduction

This Policy is a supporti ata Protection Policy of <<insert Company name>>, a com rt country of registration>> under number <<insert compan >, whose registered office is at <<insert address>> ("the ata protection and the rights of <<insert type(s) of data sub s, business contacts etc.>>.

This Policy sets out rules mployees, agents, contractors, or other parties working on b egarding the handling of personal data.

2. Definitions

"consent" nsent of the data subject which reely given, specific, informed, guous indication of the data shes by which they (by a by a clear affirmative action) agreement to the processing of relating to them;

"Data Protection Legislat pplicable data protection and including, but not limited to, the aw version of the General Data egulation ((EU) 2016/679) (the as it forms part of the law of Wales, Scotland, and Northern ue of section 3 of the European drawal) Act 2018, the Data Act 2018, the Privacy and Communications Regulations mended, and any successor

"data subject" ving, identified, or identifiable out whom the Company holds ;

"personal data" information relating to a data can be identified, directly or particular by reference to an h as a name, identification tion data, an online identifier, or more factors specific to the ysiological, genetic, mental, ltural, or social identity of that t. Unless otherwise stated, this Policy to "personal data"

	ude special category personal
"personal data breach"	ch of security leading to the unlawful destruction, loss, authorised disclosure of, or sonal data transmitted, stored, ocessed;
"processing"	peration or set of operations personal data or sets of whether or not by automated as collection, recording, tructuring, storage, adaptation retrieval, consultation, use, ransmission, dissemination or king available, alignment or restriction, erasure or
"special category persona	nal data revealing racial or political opinions, religious or beliefs, trade union health, sexual life, sexual metric, or genetic data.

3. **Data Protection Officer & S**

3.1 The Company's Data <insert name of data protection officer>>, <<insert e Data Protection Officer is responsible for admi for developing and implementing any applicable relate nd/or guidelines.

3.2 All <<insert applic managers, department heads, supervisors etc.>> a ring that all employees, agents, contractors, or other alf of the Company comply with this Policy and, wher ment such practices, processes, controls, and traini y necessary to ensure such compliance.

3.3 Any questions relatin pany's collection, processing, or holding of personal Protection Legislation should be referred to the Data P

4. **Data Protection**

4.1 The Company collec ersonal data set out in <<insert location(s)>>.

4.2 The Company only nd holds personal data for the specific purposes se on(s)>> (or for other purposes expressly permitted b gislation).

4.3 The Company will on ersonal data for and to the extent necessary for the sp ses of which data subjects have been informed (or wil

4.4 Employees, agents, arties working on behalf of the

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Company may col y to the extent required for the performance of thei ccordance with this Policy and the Company's Data P sive personal data must not be collected.

4.5 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

4.6 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 st of a data subject.

4.7 If any personal dat rate or out-of-date, all reasonable steps will be taken v r erase that data, as appropriate.

4.8 The Company shall for any longer than is necessary in light of the purpose that personal data was originally collected, held, and

4.9 When personal data l reasonable steps will be taken to erase or otherwise y.

4.10 For full details of ach to data retention, including retention periods fo ypes held by the Company, please refer to our Data Re

4.11 For more details ab roach to Data Protection and the obligations which and to all employees, agents, contractors, or othe alf of the Company, please refer to the Company's Data includes sections on:

a) The data pro

b) The rights of

c) Consent;

d) The accurac eeping personal data up-to-date;

e) Personal dat

f) Accountabili

g) Data protect

h) Privacy by d

i) Keeping dat ut their personal data and our use of it;

j) Data subject

k) Rectification

l) Erasure of p

m) Restricting p

n) **[**Personal da

o) Objections t ng;

p) **[**Automated , decision-making, and profiling;**]**

q) **[**Marketing;**]**

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r) Details of t…ted, held, and processed by the Company;

s) Data securit…

t) Organisation…

u) Transferring…es located outside of the UK; and

v) Handling dat…

5. **Data Security**

5.1 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 set out below in Par…

5.2 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.

6. **Data Handling**

6.1 All personal data m…lance with the requirements of the Data Protection Leg… Data Protection Policy, and other related policies.

6.2 All emails containin… encrypted **[**using <<insert type(s) of encryption>>**]**.

6.3 All emails containin…marked “confidential”.

6.4 Personal data may…cure networks only; transmission over unsecured net…any circumstances.

6.5 Personal data may…r a wireless network if there is a wired alternative tha…le.

6.6 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>>**]**.

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

6.8 Where personal dat…hardcopy form it should be passed directly to the reci…insert name(s) and/or type(s) of delivery service>>**]**.

6.9 All personal data to…y, whether in hardcopy form or on

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removable electroni rred in a suitable container marked "confidential".

6.10 All electronic copi hould be stored securely using passwords and **[**<<i n>>**]** data encryption.

6.11 All hardcopies of p any electronic copies stored on physical, removable securely in a locked box, drawer, cabinet, or similar.

6.12 All personal data st be backed up <<insert interval>> with backups stor offsite**]**. All backups should be encrypted **[**using << on>>**]**.

6.13 When any persona or otherwise disposed of for any reason (including w nade and are no longer needed), it should be securely of. For further information on the deletion and dispos ase refer to the Company's Data Retention Policy.

6.14 No personal data s mobile device (including, but not limited to, laptops, t), whether such device belongs to the Company or o rmal written approval of <<insert name(s) and/or pos tails>> and, in the event of such approval, strictly in ructions and limitations described at the time the a or no longer than is absolutely necessary**]**.

6.15 No personal data s ny computer or device personally belonging to an em , or other party working on behalf of the Company a only be transferred to devices belonging to agent parties working on behalf of the Company where the greed to comply fully with the letter and spirit of this P Protection Legislation (which may include demonstra that all suitable technical and organisational meas

6.16 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>>.

6.17 No personal data m nsferred to any employee, agent, contractor, or other rties are working on behalf of the Company or not, ion of <<insert name(s) and/or position(s) and con then if the sharing or transfer is secure, lawful, and hared with third parties must be covered by a suitab ensure compliance with the Data Protection Legislatio

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

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

6.20 Where personal dat is used for marketing purposes, it shall be the respons n>> to ensure that the appropriate

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consent is obtained … s have opted out, whether directly or via a third-party s…

6.21 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…

6.22 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…

6.23 Under no circumsta… ords relating to Company systems and/or personal da… computer or device **[**that is not Company-owned**]**. T… swords in internet browsers and in third-party passwor…

6.24 Under no circumsta… er or device used for accessing or handling personal d… correct security functions enabled including, as appr… codes, biometric security (e.g. fingerprint), and any… ware provided by the Company.

6.25 All software (includi… plications and operating systems) shall be kept up-to… IT staff shall be responsible for installing any and… dates **[**not more than <<insert period>> after the… available by the publisher or manufacturer**] OR [**… and practically possible**] [**, unless there are valid techn… o**]**.

6.26 No software may b… mpany-owned computer or device without the prior … sert department or position>>. **[**Notwithstanding th… the Company's IT staff shall be permitted to install s… who are not part of the IT staff or do not have the aut… shall not install software updates themselves. Automa… by the IT staff) are permitted.**]**

6.27 If any computer or… or store personal data, whether personal or Compa… tolen, the loss or theft must be reported to <<inser… n>> as soon as possible, and all assistance required… igation.

6.28 All employees, age… r parties working on behalf of the Company shall be r… their individual responsibilities and the Company's res… Data Protection Legislation and under all applicable… ding (but not limited to) this Policy and the Data Protec…

6.29 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.

6.30 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.

6.31 All employees, age… r parties working on behalf of the Company handling … ropriately trained to do so.

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6.32 All employees, age r parties working on behalf of the Company handling ropriately supervised.

6.33 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.

6.34 Methods of collecti ng personal data shall be regularly evaluated and revie

6.35 All personal data h ll be reviewed periodically, as set out in the Company

6.36 The performance o ents, contractors, or other parties working on behalf g personal data shall be regularly evaluated and revie

6.37 All employees, age r parties working on behalf of the Company handling ound to do so in accordance with the principles of the ion and this Policy by contract.

6.38 All agents, contrac orking on behalf of the Company handling personal d ny 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 the Data

6.39 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.

6.40 **[**<<Add further mea

7. Accountability and Reco

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

7.2 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

7.3 All employees, age r parties working on behalf of the Company shall be ng in data protection and privacy, addressing the rele Protection Legislation, this Policy, the Company's Da nd all other applicable Company policies.

7.4 The Company's da e shall be regularly reviewed and evaluated by means ts.

7.5 The Company sha al records of all personal data collection, holding,

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8. **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:

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