

1. Introduction

This Policy sets out the registered in <<insert couregistration number>>, w Company") regarding data "employee data subjects") Legislation (defined below)

This Policy sets out the C transfer, storage, and disp The procedures and princ Company, its employees, a the Company.

2. **Definitions**

"consent"

"data controller"

"data processor"

"Data Protection Legislat

"data subject"

Company name>>, a company under number <<insert company is at <<insert address>> ("the of its employees (in this context, hal data under the Data Protection

parding the collection, processing, lating to employee data subjects. It be followed at all times by the other parties working on behalf of

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

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 ta subjects;

person or organisation which ersonal data on behalf of a data

applicable data protection and including, but not limited to, the any applicable national laws, and secondary legislation in Wales concerning the processing data or the privacy of electronic ons, as amended, replaced, or time to time;

iving, identified, or identifiable pout whom the Company holds a (in this context, employee data

S

"EEA"

"personal data"

"personal data breach"

"processing"

"pseudonymisation"

"special category person

3. Data Protection Officer &

3.1 The Company's Da officer>>, <<insert responsible [, wor</p>

European Economic Area, all EU Member States, Iceland, and Norway;

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 re factors specific to the physical, genetic, mental, economic, cial identity of that data subject;

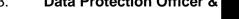
each of security leading to the prevention, loss, inauthorised disclosure of, or ersonal data transmitted, stored, processed;

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

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

nal data revealing racial or ethnic tical opinions, religious or beliefs, trade union membership, tual life, sexual orientation, genetic data.

<<insert name of data protection ne Data Protection Officer is <<insert department, e.g. HR



Department, or pos for developing and and/or guidelines.

- 3.2 All <<insert appl supervisors etc.>> contractors, or othe this Policy and, whe controls, and trai compliance.
- 3.3 Any questions relat holding of persona referred to the Data

,] for administering this Policy and able related policies, procedures,

managers, department heads, uring that all employees, agents, half of the Company comply with lement such practices, processes, bly necessary to ensure such

mpany's collection, processing, or Protection Legislation should be

4. The Data Protection Prince

The Data Protection Legis handling personal data mu be able to demonstrate, su

- 4.1 processed lawfully, subject;
- 4.2 collected for spec processed in a mat processing for arch research purposes incompatible with the
- 4.3 adequate, relevant purposes for which
- 4.4 accurate and, wher be taken to ensure purposes for which
- 4.5 kept in a form which necessary for the production data may be store processed solely for historical research professional research protection Legislatidata subject;
- 4.6 processed in a mar including protection accidental loss, d organisational meas

5. The Rights of Data Subje

The Data Protection Legis subjects:

- 5.1 the right to be inforr
- 5.2 the right of access;

ving principles with which anyone ers are responsible for, and must hal data must be:

ent manner in relation to the data

imate purposes and not further ble with those purposes. Further blic interest, scientific or historical shall not be considered to be

is necessary in relation to the

date. Every reasonable step must s inaccurate, having regard to the , or rectified without delay;

data subjects for no longer than is sonal data is processed. Personal ofar as the personal data will be the public interest, scientific or irposes, subject to implementation all measures required by the Data of the rights and freedoms of the

riate security of the personal data, runlawful processing and against using appropriate technical or

ving key rights applicable to data

- 5.3 the right to rectificat
- 5.4 the right to erasure
- 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

6. Lawful, Fair, and Transpa

- 6.1 The Data Protecti processed lawfully, rights of the data spersonal data shall
 - a) the data sub data for one
 - b) the processi the data sub the data sub
 - c) the processi which the da
 - d) the process subject or of
 - e) the processi the public in data controll
 - f) the processi pursued by interests are data subject where the data
- 6.2 If the personal data as 'sensitive persor met in addition to or
 - a) the data sub such data f Member Sta
 - b) the process obligations a data subjection la law or a coll provides for interests of the obligations.
 - c) the process subject or physically or

to be forgotten');

aking and profiling.

o ensure that personal data is y, without adversely affecting the GDPR states that processing of one of the following applies:

o the processing of their personal s;

erformance of a contract to which er to take steps at the request of a contract;

npliance with a legal obligation to

ect the vital interests of the data

erformance of a task carried out in of official authority vested in the

urposes of the legitimate interests a third party, except where such mental rights and freedoms of the on of personal data, in particular

itegory personal data (also known f the following conditions must be ut above:

licit consent to the processing of ed purposes (unless EU or EU n doing so);

he purpose of carrying out the this of the data controller or of the ment, social security, and social rised by EU or EU Member State int to EU Member State law which for the fundamental rights and

ect the vital interests of the data son where the data subject is g consent;

- d) the data con with a politi processing provided that members of connection disclosed out
- e) the processi by the data s
- f) the process whenever co
- g) the processi the basis of to the aim protection, a safeguard th
- h) the process occupationa an employee care or treat or services of a contract visafeguards in
- i) the processi public healt threats to health care of EU or EU measures to particular, pr
- j) the process interest, so purposes in EU Member respect the suitable and and the inter

7. Consent

If consent is relied upon as any personal data, the follo

- 7.1 Consent is a clea processing of their pastatement or a punlikely to amount t
- 7.2 Where consent is section dealing with matters.
- 7.3 Data subjects are f

sociation, or other non-profit body ous, or trade union aim, and the ourse of its legitimate activities, solely to the members or former who have regular contact with it in that the personal data is not e consent of the data subjects;

ta which is manifestly made public

the conduct of legal claims or dicial capacity;

stantial public interest reasons, on law which shall be proportionate the essence of the right to data uitable and specific measures to l interests of the data subject;

he purposes of preventative or ssment of the working capacity of for the provision of health or social nt of health or social care systems. Member State law or pursuant to al, subject to the conditions and of the GDPR:

lic interest reasons in the area of ing against serious cross-border tandards of quality and safety of s or medical devices, on the basis provides for suitable and specific d freedoms of the data subject (in

irchiving purposes in the public search purposes, or statistical 9(1) of the GDPR based on EU or proportionate to the aim pursued, data protection, and provide for safeguard the fundamental rights

ecting, holding, and/or processing

subject that they agree to the ar indication may take the form of pre-ticked boxes, or inactivity are

hich includes other matters, the clearly separate from such other

at any time and it must be made

easy for them to do be honoured promp

- 7.4 If personal data is t with the purpose of collected that was their consent, consobtained from the d
- 7.5 Where special cat normally rely on a la relied upon, the dat notice in order to ca
- 7.6 In all cases where holding, and/or procontained in order to with consent require

8. Specified, Explicit, and Lo

- 8.1 The Company colle Part 23 of this Polic
 - a) personal data
 - b) [personal da
- 8.2 The Company only the specific purpos expressly permitted
- 8.3 Employee data sub purposes for which15 for more informa

9. Adequate, Relevant, and

- 9.1 The Company will of the extent necessal data subjects have and as set out in Pa
- 9.2 Employees, agents
 Company may colle
 the performance of
 Excessive personal
- 9.3 Employees, agents
 Company may proc
 their job duties rec
 cannot be processe

10. Accuracy of Data and Ke

10.1 The Company sha processed, and held draws consent, their request must

erent purpose that is incompatible hat personal data was originally subject when they first provided or purposes may need to be

processed, the Company shall plicit consent. If explicit consent is to be issued with a suitable privacy

as the lawful basis for collecting, cords must be kept of all consents by can demonstrate its compliance

employee personal data set out in

employee data subjects[.] OR [;

rties.]

holds employee personal data for this Policy (or for other purposes egislation).

ned at all times of the purpose or personal data. Please refer to Part jects informed.

g

employee personal data for and to e or purposes of which employee informed) as under Part 8, above,

parties working on behalf of the ata only to the extent required for ly in accordance with this Policy.

parties working on behalf of the lata only when the performance of onal data held by the Company ons.

ployee personal data collected, nd up-to-date. This includes, but is



not limited to, the re data subject, as set

10.2 The accuracy of em and at [regular] OR personal data is fou be taken without de

10.3 It is the responsibili personal data they such personal data member of staff a possible. The Com meet its obligations

11. **Data Retention**

- 11.1 The Company shall necessary in light collected, held, and
- 11.2 When employee pe be taken to erase of
- 11.3 For full details of retention periods for refer to our Data Re

12. **Secure Processing**

- The Company shall and processed is k processing and ad details of the techn provided in the C Policy].
- 12.2 All technical and or data shall be requ effectiveness and th
- 12.3 Data security must integrity, and availa
 - only those w a) data and wh
 - b) employee pe or purposes
 - authorised u c) data as requ

Accountability and Recor 13.

The Data Protection 13.1 <<insert departmen for administering

ata at the request of an employee

all be checked when it is collected ervals thereafter. If any employee ut-of-date, all reasonable steps will at data, as appropriate.

e data subjects to ensure that the ompany is kept up-to-date. If any should ensure that the relevant rmed as soon as is reasonably peration of its employees to help n Legislation.

sonal data for any longer than is oses for which it was originally

required, all reasonable steps will ecurely and without delay.

ach to data retention, including pes held by the Company, please

ee personal data collected, held, against unauthorised or unlawful destruction, or damage. Further leasures which shall be taken are ty Policy] AND/OR [IT Security

ken to protect employee personal aluated to ensure their ongoing mplovee personal data.

s by protecting the confidentiality, onal data as follows:

cess and use employee personal may access and use it;

urate and suitable for the purpose held, and processed; and

ole to access employee personal irpose or purposes.

sible [, working together with the or position, e.g. HR Manager>>,1 veloping and implementing any





applicable related p

- 13.2 The Company shal collecting, holding, Impact Assessmer significant risk to the refer to Part 14 for for the company shall collected as the collected as th
- 13.3 All employees, age Company shall be addressing the rele and all other applica
- 13.4 The Company's da evaluated by means
- 13.5 The Company sha data collection, hold
 - a) the name ar any applicab other data co
 - b) the purpose employee pe
 - c) the Compar consent, the such conse personal dat
 - d) details of the processed t subject to wl
 - e) details of a countries ind
 - f) details of he Company (p
 - g) details of em
 - h) detailed des taken by the data.

14. Data Protection Impact A

- 14.1 In accordance with Data Protection Impuses of employee and where the procand freedoms of em
- 14.2 The principles of 'p collecting, holding, factors should be ta
 - a) the nature, sholding, and

or guidelines.

esign' approach at all times when be personal data. Data Protection if any processing presents a of employee data subjects (please

r parties working on behalf of the ig in data protection and privacy, Protection Legislation, this Policy,

shall be regularly reviewed and

records of all employee personal ch shall incorporate the following:

ly, its Data Protection Officer, and ers (including data processors and sonal data is shared);

y collects, holds, and processes

es (including, where applicable, ning such consent, and records of ling, and processing employee

personal data collected, held, and he categories of employee data lates:

yee personal data to non-EEA nd security safeguards;

onal data will be retained by the ny's Data Retention Policy);

rage, including location(s); and

al and organisational measures ne security of employee personal

y by Design

ples, the Company shall carry out y and all new projects and/or new olve the use of new technologies to result in a high risk to the rights

ld be followed at all times when ree personal data. The following

ose or purposes of the collection,

- b) the state d measures to
- the cost of in c)
- d) the risks po including the
- 14.3 Data Protection Imp Officer and shall ad
 - a) the type(s) of processed;
 - the purpose b)
 - c) the Compan
 - how employ d)
 - e) the parties (i
 - f) the necessit the purpose
 - risks posed g)
 - i)

h) risks posed proposed me

ant technical and organisational

res: and

subjects and to the Company,

e overseen by the Data Protection

ta that will be collected, held, and

ersonal data is to be used:

used:

vho are to be consulted;

he data processing with respect to ocessed:

s;

mpany; and

handle identified risks.

15. Keeping Data Subjects In

- 15.1 The Company shall employee data subj
 - Where emp a) data subject purpose at the
 - where empl b) relevant emp
 - i) if the data
 - ii) if the that t
 - iii) as sd one r
- 15.2 The following inform
 - details of the a) details, and representativ
 - the purpose b) and will be lawful basis
 - c) where applic justifying its

set out in Part 15.2 to every data

collected directly from employee subjects will be informed of its

obtained from a third party, the be informed of its purpose:

communicate with the employee mmunication is made: or

ansferred to another party, before

le and in any event not more than data is obtained.

h the form of a privacy notice:

not limited to, all relevant contact ntact details of any applicable n Officer:

e personal data is being collected n Part 23 of this Policy) and the nd processing;

rests upon which the Company is of the employee personal data;

- d) where the e employee da processed;
- e) where the e third parties,
- f) where the e that is locate not limited t further detail
- g) details of ap
- h) details of the Legislation;
- i) details of the the Compar applicable);
- j) details of t
- k) where the e employee da
- I) where applion obligation need personal date and
- m) details of a place using decisions win consequence

16. Data Subject Access

- 16.1 Employee data sub time to find out mor them, what it is doin
- 16.2 Employees wishing Request Form, sen <<insert contact det</p>
- 16.3 Responses to SAF however, this may and/or numerous redata subject shall be
- 16.4 All SARs received s [in accordance with Procedure].
- 16.5 The Company does Company reserves information that has for requests that a such requests are r

is not obtained directly from the es of personal data collected and

s to be transferred to one or more

s to be transferred to a third party etails of that transfer, including but be (see Part 25 of this Policy for

riods:

s rights under the Data Protection

s right to withdraw their consent to personal data at any time (where

pject's right to complain to the ne 'supervisory authority');

is not obtained directly from the the source of that personal data;

gal or contractual requirement or and processing of the employee sequences of failing to provide it;

making or profiling that will take tata, including information on how ance of those decisions, and any

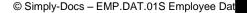
access requests ("SARs") at any a which the Company holds about , and why.

d do so using a Subject Access npany's Data Protection Officer at

ade within one month of receipt; vo months if the SAR is complex ch additional time is required, the

Company's Data Protection Officer ubject Access Request Policy and

ne handling of normal SARs. The nable fees for additional copies of to an employee data subject, and or excessive, particularly where



17. Rectification of Personal

- 17.1 Employee data sub their personal data
- 17.2 The Company shall the employee data employee data subj extended by up to additional time is re
- 17.3 In the event that ar third parties, those made to that persor

uire the Company to rectify any of mplete.

sonal data in question, and inform cation, within one month of the ny of the issue. The period can be se of complex requests. If such a subject shall be informed.

rsonal data has been disclosed to d of any rectification that must be

18. Erasure of Personal Data

- 18.1 Employee data sub the personal data it
 - a) it is no lon personal dat collected or
 - b) the employed applicable) data;
 - c) the employ processing to interest to al Policy for fur
 - d) the employe
 - e) the employed Company to
 - f) [the employ purpose of p
- 18.2 Unless the Compa personal data, all employee data subj the employee data months in the case employee data subj
- 18.3 In the event that an to an employee da those parties shall the require disproportion

19. Restriction of Personal D

19.1 Employee data sub Company ceases pemployee data sub equest that the Company erases ollowing circumstances:

Company to hold that employee pose(s) for which it was originally

to withdraw their consent (where g and processing their personal

s to the Company holding and there is no overriding legitimate tinue doing so) (see Part 21 of this he right to object);

n processed unlawfully;

to be erased in order for the legal obligation[;] **OR** [.]

ing held and processed for the ety services to a child.

nds to refuse to erase employee hall be complied with, and the ure, within one month of receipt of riod can be extended by up to two uch additional time is required, the

a that is to be erased in response been disclosed to third parties, e (unless it is impossible or would

ed circumstances, request that the data it holds about them. If an est, the Company shall retain only



the amount of empthat is necessary to further.

19.2 In the event that ar third parties, those processing it (unles do so).

20. [Data Portability

- 20.1 The Company pr
- 20.2 Where employee d processing their p otherwise required and the employee of the Data Protection use it for other purp
- 20.3 To facilitate the right applicable personal
 - a) <tormat
 - b) <<add further
- 20.4 Where technically personal data shall
- 20.5 All requests for co within one month o extended by up to to such additional time

21. Objections to Personal D

- 21.1 Employee data sub their personal dat (including profiling), statistics purposes.
- 21.2 Where an employe personal data base processing immedia legitimate grounds interests, rights, ar conduct of legal clai
- 21.3 Where an employe personal data for d processing promptly
- 21.4 Where an employe personal data for s the employee data "demonstrate groun is not required to co

ncerning that data subject (if any) data in question is not processed

rsonal data has been disclosed to d of the applicable restrictions on d require disproportionate effort to

a relating to employees using ated processing>>.

their consent to the Company to a manner, or the processing is a contract between the Company ata subjects have the right, under copy of their personal data and to g it to other data controllers).

Company shall make available all ubjects in the following format[s]:

by an employee data subject, uired data controller.

nal data shall be complied with ject's request. The period can be complex or numerous requests. If e data subject shall be informed.]

bject to the Company processing interests, for direct marketing itific and/or historical research and

to the Company processing their ts, the Company shall cease such lemonstrated that the Company's rride the employee data subject's processing is necessary for the

to the Company processing their s, the Company shall cease such

to the Company processing their research and statistics purposes, the Data Protection Legislation, particular situation". The Company ecessary for the performance of a

task carried out for

22. [Automated Processing,

- 22.1 [The Company use decision-making pro
 - a) <<Insert out
- 22.2 [The Company us purposes as follows
 - a) <<Insert out
- 22.3 The activities outling location(s)>>) are go where the resulting subjects unless one
 - a) the data sub
 - b) the processi
 - c) the process contract bety
- 22.4 If special category processing can only
 - a) the data sub
 - b) the processi
- 22.5 Where decisions at profiling), employee decisions, request to obtain an explar subjects must be ex
- 22.6 In addition to the at subjects explaining the significance and
- 22.7 When employee pe automated decision
 - a) appropriate
 - b) technical al minimise the them to be e
 - c) all personal order to prev

23. Personal Data

The Company collects, hol times in accordance with obligations under the Data

For details of data retention

aking, and Profiling

ning its employees in automated

decision-making>>.]

rning its employees for profiling

tivities>>.]

d described in detail in <<insert er the Data Protection Legislation similarly significant effect on data

cit consent;

br

entry into, or performance of, a he data subject.

processed in this manner, such he following applies:

cit consent; or

ns of substantial public interest.

automated processing (including right to object, to challenge such press their own point of view, and om the Company. Employee data ght at the first point of contact.

ust be provided to employee data decision-making or profiling, and so of the decision or decisions.

ny form of automated processing, following shall apply:

Il procedures shall be used;

sures shall be implemented to ccur, such measures must enable

this manner shall be secured in arising.

hal data about its employees at all ects' rights and the Company's d this Policy.

pany's Data Retention Policy.

Special Category Person

- 23.1 Any and all specia processed will be us out in Part 6 of this
- 23.2 Special category per department(s) and/or the purpose(s) for varieve aled to other expended for the Communication in the concerned, and such Part 6 of this Policy

Identification Information

- 23.3 The following identif
 - a) Name;
 - b) Contact Deta
 - c) <<add further

Employment Records

- 23.4 The following inform
 - a) Interview no
 - b) CVs, applica
 - c) Assessment
 - d) Details of recommission,
 - e) Records of formal and in
 - f) Details of g interviews, p
 - g) <<add further

Equal Opportunities Mon

- 23.5 Equal opportunities processed. Where puse special catego with employee data lawful basis (as liste
- 23.6 Such data will only unlawful discrimina development, asset and dismissals are experience, skills, a
- 23.7 Employees may re them. All requests r and/or position(s) a
- 23.8 The following inform

ersonal data collected, held, and with the applicable conditions set

essible and used only by <<insert ktent strictly necessary to achieve I, and processed and shall not be actors, or other parties working on tional circumstances where it is of the employee data subject(s) he applicable conditions set out in

e collected, held, and processed:

eld, and processed:

rs, and similar documents;

and similar documents;

alaries, pay increases, bonuses, expenses;

uding reports and warnings, both

cumentary evidence, notes from outcomes;

n will be collected, held, and e anonymised. The Company will ual opportunities monitoring [only [on the lawful basis of <<insert

uired to reduce, stop, and prevent recruitment, promotion, training, rms of employment, redundancy, asis of capability, qualifications,

/ does not hold such data about
nd addressed to <<insert name(s)</pre>

eld, and processed:

- a) Age;
- b) Gender:
- c) Ethnicity;
- d) Nationality;
- e) Religion;
- f) <<add further

Health Records

- 23.9 Health information constitutes special special category employee data sub basis (as listed in P
- 23.10 Health data will be employees are able unlawful or unfair im
- 23.11 Employees may re them. All requests r and/or position(s) a
- 23.12 The following inform
 - a) Details of side
 - b) Medical con
 - c) Disabilities;
 - d) Prescribed n
 - e) <<add further

Benefits

- 23.13 If an employee is er be necessary for the employee. Any suinformation prior to requirements set out
- 23.14 The Company sha necessary for the a

[Trade Union Data

- 23.15 The Company will property bona fide trade un employee's trade un data. The Compan subjects' consent] (Part 6)>>].
- 23.16 Employees may red to trade unions and
- 23.17 The following inform
 - a) Name;

and processed. Most health data onal data. The Company will use lth-related purposes [only with the lawful basis of <<insert lawful

extent required to ensure that rrectly, legally, safely, and without tion.

/ does not hold such data about
Ind addressed to <<insert name(s)</pre>

eld, and processed:

ne offered by the Company, it may to collect personal data from the provided with the necessary ir data (as per the information

rsonal data except to the extent ant benefits schemes.

data about relevant employees to Company). Most data about an titutes special category personal rposes [only with employee data f <<insert lawful basis (as listed in

loes not supply their personal data right before any transfer is made.

- b) Job descript
- <<insert type c)
- d) <<add further

Employee Monitoring

- 23.18 The Company may internet and email criminal investigation employees will be shall not normally in
- 23.19 Monitoring will tak Personal data colle and processed for r intended result. M employees' rights u
- 23.20 Intrusion upon em avoided whenever place outside of an the employee is Company email, i employees.

24. **Sharing Personal Data**

- specific safeguards
- 24.2 Employee personal contractors, or othe has a legitimate, job be shared with a th the provisions of Pa
- 24.3 Where a third-part personal data on
- 24.4 Employee personal
 - a) the third pai
 - the sharing b)
 - c) security stat adequate se

purpose>>;

tor employees' activities, such as eptional circumstances (such as severity) justify covert monitoring, monitoring in advance. Monitoring 's duties.

ompany considers it necessary. oses will only be collected, held, , and necessary for, achieving the conducted in accordance with Leaislation.

hunications and activities will be ircumstances will monitoring take e of work or working hours unless hent or other facilities such as vided by the Company for its

personal data with third parties if

ed with other employees, agents, alf of the Company if the recipient any employee personal data is to of the European Economic Area, oply.

ed, that processor shall process (as data controller) only on the

d with third parties in the following

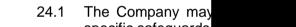
d to know the information for the company under a contract;

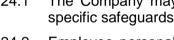
al data concerned complies with cted employee data subjects (see hd, if required, the employees aring of their personal data;

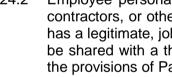
to comply with all applicable data ocedures, and has put in place ct the employee personal data:

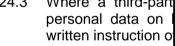
lies with any cross-border transfer

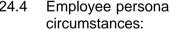
containing GDPR-approved third vith the third-party recipient.

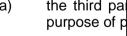


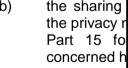


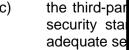












- d) (where appli restrictions (
- a fully exec e) party clause

25. Transferring Personal Da

- 25.1 The Company may available remotely) and EEA.
- 25.2 The transfer of empty EEA shall take place
 - a) the transfer that country Commission for personal
 - b) the transfer provides ap agreement rules; stand Commission by a supervicertification for in the Da authorised inserted into bodies author
 - c) the transfer relevant emp
 - d) the transfer employee dataken at the
 - e) the transfer
 - f) the transfer
 - g) the transfer data subject physically or
 - h) the transfer intended to access by the show a legition.

26. Data Breach Notification

- 26.1 All personal data reported immediate
- 26.2 If an employee, ac Company becomes occurred, they musevidence relating to retained.
- 26.3 If a personal data be the rights and freed

the [UK and] EEA

Insfer ('transfer' includes making a to countries outside of the [UK

a country outside of the [UK and] ne following applies:

or one or more specific sectors in organisation), that the European s an adequate level of protection

international organisation) which the form of a legally binding ies or bodies; binding corporate uses adopted by the European proved code of conduct approved formation Commissioner's Office); ification mechanism (as provided); contractual clauses agreed and ervisory authority; or provisions ents between public authorities or supervisory authority;

med and explicit consent of the

ormance of a contract between the pany (or for pre-contractual steps data subject);

t public interest reasons:

uct of legal claims;

he vital interests of the employee ere the employee data subject is eir consent; or

er that, under UK or EU law, is the public and which is open for therwise to those who are able to a the register.

mployee personal data must be Protection Officer.

r party working on behalf of the that a personal data breach has igate it themselves. Any and all ch in question should be carefully

reach is likely to result in a risk to ubjects (e.g. financial loss, breach



of confidentiality, of social or economic Information Commit and in any event, w

- 26.4 In the event that a part a higher risk than the employee data substituted affected employee without undue delay
- 26.5 Data breach notifica
 - a) The categori
 - b) The category concerned;
 - c) The name a (or other cor
 - d) The likely co
 - e) Details of t Company t measures to

27. Implementation of Policy

This Policy shall be deem shall have retroactive effect this date.

This Policy has been approved an

Name: <<insert

Position: <<insert

Date: <<insert

Due for Review by: <<insert

Signature:



hal damage, or other significant ection Officer must ensure that the ned of the breach without delay, g become aware of it.

kely to result in a high risk (that is, 26.3) to the rights and freedoms of ion Officer must ensure that all med of the breach directly and

llowing information:

ber of data subjects concerned;

umber of personal data records

Company's data protection officer formation can be obtained);

h:

proposed to be taken, by the including, where appropriate, erse effects.

ert date>>. No part of this Policy ly to matters occurring on or after