

#### 1. Introduction

This Policy sets out the registered in <<insert couregistration number>>, w Company") regarding data subject, e.g. staff, custome their personal data under I from time to time regulatir communications including, Protection Regulation ("GI legislation or other directly privacy for as long as, and

This Policy sets the Con transfer, storage, and disp out herein must be follow contractors, or other part working from home.

#### 2. Definitions

"consent"

"data controller"

"data processor"

"data subject"

"EEA"

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Company name>>, a company inder number <<insert company is at <<insert address>> ("the ghts of <<insert type(s) of data c.>> ("data subjects") in respect of egislation and regulations in force data and the privacy of electronic egulation 2016/679 General Data on Act 2018, and any successor on relating to data protection and t has legal effect in the UK).

rding the collection, processing, he procedures and principles set Company, its employees, agents, of the Company, including when

onsent 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

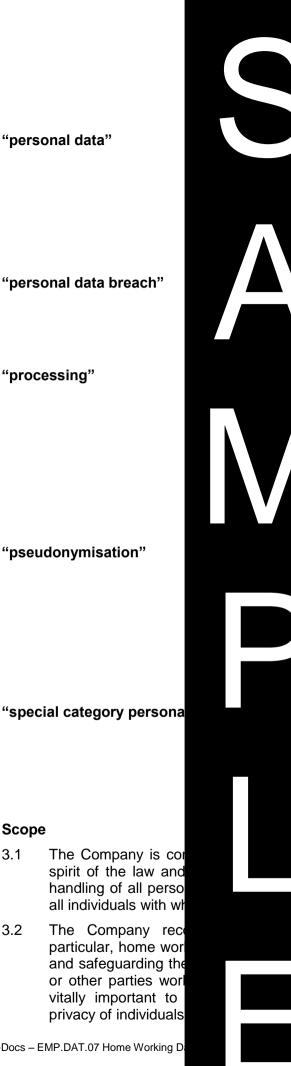
natural or legal person or which, alone or jointly with others, the purposes and means of the f personal data. For the purposes cy, the Company is the data all personal data relating to e(s) of data subject, e.g. staff, pusiness contacts etc.>> used in for our commercial purposes;

natural or legal person or which processes personal data a data controller;

iving, identified, or identifiable on about whom the Company al data;

European Economic Area,

1



all EU Member States, Iceland, and Norway;

information relating to a data can be identified, directly or particular by reference to an h as a name, identification ion data, an online identifier, or e factors specific to the physical. genetic, mental, economic, cial identity of that data subject;

ach of security leading to the unlawful destruction, loss, hauthorised disclosure of. or rsonal data transmitted, stored, rocessed:

pperation or set of operations personal data or sets of , whether or not by automated h collection, recording, as structuring, storage, adaptation retrieval, consultation, use, transmission, dissemination or aking available, alignment or restriction. erasure or

cessing of personal data in such the personal data can no longer o a specific data subject without litional information, provided that al information is kept separately t to technical and organisational ensure that the personal data is to an identified or identifiable h; and

al data revealing racial or ethnic cal opinions, religious or beliefs, trade union membership, lal life. orientation. sexual enetic data.

letter of the law, but also to the on the correct, lawful, and fair legal rights, privacy, and trust of

vorking arrangements and, in viding a better work life balance employees, agents, contractors, working from home, it remains sonal data and the rights and

3. Scope

- 3.1
- 3.2

- 3.3 The Company's Da officer>>, <<insert responsible for adm any applicable relat
- 3.4 All <<insert appl supervisors etc.>> contractors, or othe this Policy and, whe controls, and trai compliance. When particular, training, s
- 3.5 Any questions rela referred to the Da Officer should alway
  - a) if there is an data is to be
  - b) if consent is personal dat
  - c) if there is a particular type
  - d) if any new documentati
  - e) if any assis subject's rig access requ
  - f) if a personal
  - g) if there is technical or
  - h) if there are maintenance
  - i) if personal of parties are a
  - j) if personal or questions re
  - k) when any s significant c which will re
  - when persor
    which it was
  - m) if any autom making, is to
  - n) if any assist direct marke

# 4. The Data Protection Princ

This Policy aims to ensure

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<<insert name of data protection he Data Protection Officer is for developing and implementing and/or guidelines.

managers, department heads, uring that all employees, agents, half of the Company comply with ement such practices, processes, bly necessary to ensure such oriate, such measures and, in remotely to home workers.

Data Protection Law should be n particular, the Data Protection owing cases:

he lawful basis on which personal rocessed;

er to collect, hold, and/or process

to the retention period for any

otices or similar privacy-related

aling with the exercise of a data mited to, the handling of subject

or actual) has occurred;

to security measures (whether o protect personal data;

ng to the implementation and a home working environment;

third parties (whether such third or data processors);

outside of the EEA and there are n which to do so;

g activity is to be carried out, or to existing processing activities, npact Assessment;

or purposes different to those for

ig profiling or automated decision-

plying with the law applicable to

otection Law. The GDPR sets out

the following principles wi Data controllers are resp compliance. All personal da

- 4.1 processed lawfully, subject;
- 4.2 collected for spec processed in a ma processing for arch research purposes incompatible with th
- 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 p data may be store processed solely for historical research p of the appropriate GDPR in order to sa
- 4.6 processed in a mar including protection accidental loss, d organisational meas

## 5. The Rights of Data Subje

The GDPR sets out the foll

- 5.1 The right to be infor
- 5.2 the right of access;
- 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 Data Protection Lav fairly, and transpar subject. Specifically be lawful if at least
  - a) the data sub data for one

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lling personal data must comply. be able to demonstrate, such

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 tional measures required by the eedoms of the data subject;

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

le to data subjects:

to be forgotten');

king and profiling.

ersonal data is processed lawfully, affecting the rights of the data processing of personal data shall es:

o the processing of their personal s;

4

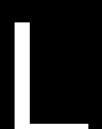
- b) the processi the data sut the data sub
- c) the process which the da
- d) the process subject or of
- e) the processi the public in data controll
- f) the processi pursued by interests are data subject where the data
- 6.2 [If the personal data as "sensitive person met:
  - a) the data sul such data fo from doing s
  - b) the process obligations a data subjec protection la
  - c) the process subject or physically or
  - d) the data con with a politi processing provided tha members of connection disclosed ou
  - e) the processi by the data s
  - f) the process whenever co
  - g) the processi the basis of respect the e suitable and and interests
  - h) the process occupationa an employee care or treat or services of













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

pliance 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

ategory personal data (also known f the following conditions must be

licit consent to the processing of purposes (the law prohibits them

he purpose of carrying out the hts of the data controller or of the ment, social security, and social sed law);

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

sociation, or other non-profit body bus, 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;

tantial public interest reasons, on ortionate to the aim pursued, shall ta protection, and shall provide for safeguard the fundamental rights

he purposes of preventative or ssment of the working capacity of for the provision of health or social ht of health or social care systems irsuant to a contract with a health

professional Data Protect

- the processi public healt threats to h health care a of law which the rights ar secrecy); or
- j) the process interest, sc purposes wi pursued, re provide for fundamental

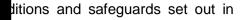
## 7. Consent

If consent is relied upon as personal data, the following

- 7.1 Consent is a clea processing of their pa statement or a punikely to amount t
- 7.2 Where consent is section dealing with matters.
- 7.3 Data subjects are f easy for them to do be honoured promp
- 7.4 If personal data is t with the purpose of collected that was their consent, cons obtained from the d
- 7.5 [If special category rely on a lawful ba upon, the data sut notice in order to ca
- 7.6 In all cases where holding, and/or proc obtained in order to with consent require

#### 8. Specified, Explicit, and Lo

- 8.1 The Company colle this Policy. This incl
  - a) personal dat



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 d specific measures to safeguard subject (in particular, professional

rchiving purposes in the public search purposes, or statistical shall be proportionate to the aim he right to data protection, and c measures to safeguard the of the data subject.]

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 draws consent, their request must

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

sed, the Company shall normally nsent. If explicit consent is relied be issued with a suitable privacy

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

ersonal data set out in Part 24 of

data subjects[.] OR [; and]

- b) [personal da
- 8.2 The Company onl specific purposes expressly permitted
- 8.3 Data subjects must for which the Comp more information or

## 9. Adequate, Relevant, and

- 9.1 The Company will on necessary for the subsen informed (or value of val
- 9.2 Employees, agents Company may col performance of the Excessive personal
- 9.3 Employees, agents Company may prod duties requires it. F for any unrelated re

## 10. Accuracy of Data and Ke

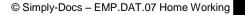
- 10.1 The Company shal held by it is kept ac the rectification of p Part 17, below.
- 10.2 The accuracy of pe [regular] OR [<<ins found to be inaccurate without delay to am

#### 11. Data Retention

- 11.1 The Company shall light of the purpose collected, held, and
- 11.2 When personal data erase or otherwise of this Policy (ir and in our Data Ret
- 11.3 For full details of retention periods fo refer to our Data Re

#### 12. Secure Processing

12.1 The Company sha















## rties.]

and holds personal data for the nis Policy (or for other purposes

times of the purpose or purposes data. Please refer to Part 15 for formed.

# g

bersonal data for and to the extent oses of which data subjects have r Part 8, above, and as set out in

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

parties working on behalf of the when the performance of their job e Company cannot be processed

al data collected, processed, and his includes, but is not limited to, est of a data subject, as set out in

ecked when it is collected and at thereafter. If any personal data is reasonable steps will be taken s appropriate.

or any longer than is necessary in that personal data was originally

I reasonable steps will be taken to y. Further detail is provided in Part personal data for home workers)

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

sonal data collected, held, and

processed is kept processing and ac details of the techn provided in Parts 25

- 12.2 All technical and or be regularly reviewe the continued secur
- 12.3 Data security must integrity, and availa
  - a) only those v who are auth
  - b) personal da purposes for
  - c) authorised u required for

## 13. Accountability and Recor

- The Data Protection developing and im and/or guidelines.
- 13.2 The Company shal collecting, holding, Assessments shall to the rights and fre information).
- 13.3 All employees, age Company shall be addressing the rele other applicable Co
- 13.4 The Company's da evaluated by means
- 13.5 The Company sha collection, holding, information:
  - 13.5.1 the name ar any applicab other data c
  - 13.5.2 the purpose personal dat
  - 13.5.3 the Compar consent, the such conser
  - 13.5.4 details of t processed t which that p
  - 13.5.5 details of an all mechanis

against unauthorised or unlawful destruction, or damage. Further neasures which shall be taken are

ken to protect personal data shall re their ongoing effectiveness and

s by protecting the confidentiality, as follows:

ccess and use personal data and ess and use it;

and suitable for the purpose or d, and processed; and

le to access the personal data as r purposes.

r administering this Policy and for ble related policies, procedures,

sign approach at all times when al data. Data Protection Impact cessing presents a significant risk (please refer to Part 14 for further

r parties working on behalf of the ig in data protection and privacy, rotection Law, this Policy, and all

e shall be regularly reviewed and ts.

al records of all personal data shall incorporate the following

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

y collects, holds, and processes

es (including, but not limited to, ning such consent, and records of and processing personal data;

onal data collected, held, and he categories of data subject to

ata to non-EEA countries including rds;

13.5.6 details of he (please reference)13.5.7 details of pe13.5.8 detailed detailed detailed detailed

taken by the

#### 14. Data Protection Impact A

- 14.1 In accordance with out Data Protection new uses of perso where the processin freedoms of data su
- 14.2 The principles of collecting, holding, be taken into consid
  - a) the nature, s holding, and
  - b) the state c measures to
  - c) the cost of ir
  - d) the risks po likelihood an
- 14.3 Data Protection Imp Officer and shall ad
  - a) the type(s) c
  - b) the purpose
  - c) the Compan
  - d) how persona
  - e) the parties (i
  - f) the necessit the purpose
  - g) risks posed
  - h) risks posed
  - i) proposed me

## 15. Keeping Data Subjects In

- 15.1 The Company shall subject:
  - a) where perso subjects will
  - b) where perso subjects will

will be retained by the Company Retention Policy);

Iding location(s);

al and organisational measures security of personal data.

## y by Design

inciples, the Company shall carry r any and all new projects and/or the use of new technologies and sult in a high risk to the rights and

d be followed at all times when data. The following factors should

ose or purposes of the collection,

ant technical and organisational

res; and

d to the Company, including their

e overseen by the Data Protection

be collected, held, and processed; a is to be used;

vho are to be consulted;

he data processing with respect to ocessed;

mpany; and handle identified risks.

set out in Part 15.2 to every data

ctly from data subjects, those data se at the time of collection; and

m a third party, the relevant data se:





- i) if the subje
- if the ii) that t

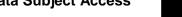
iii) as sd one r

#### 15.2 The following inform

- a) details of the the names a Data Protect
- b) the purpose be processe justifying that
- where applic C) justifying its
- where the p d) the categorie
- e) where the p parties, deta
- where the p f) located outs limited to the details);
- details of ap g)
- details of the h)
- details of th i) Company's
- details of the j) Commission Protection L
- where the p k) details abou
- where appli I) obligation ne data and det
- details of a m) place using will be ma consequenc

#### 16. **Data Subject Access**

- 16.1 Data subjects may out more about the it is doing with that
- Employees wishing 16.2





to communicate with the data nication 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, contact details, and applicable representatives and its

al data is being collected and will of this Policy) and the lawful basis ng;

rests upon which the Company is of the personal data:

hed directly from the data subject, ted and processed;

transferred to one or more third

ansferred to a third party that is of that transfer, including but not e Part 31 of this Policy for further

riods:

der Data Protection Law:

to withdraw their consent to the hal data at any time;

to complain to the Information ervisory authority" under Data

ned directly from the data subject, nal data:

al or contractual requirement or n and processing of the personal s of failing to provide it; and

making or profiling that will take ling information on how decisions of those decisions, and any

uests ("SARs") at any time to find Company holds about them, what

uld do using a Subject Access





Request Form, sen <<insert contact det

- 16.3 Responses to SAR however, this may and/or numerous re data subject shall b
- 16.4 All SARs received s
- 16.5 All employees, age Company working f working with is ke processed] within t system(s)>>] syster fully cooperate fully any SAR received v
- 16.6 The Company does Company reserves information that has that are manifestly are repetitive.

# 17. Rectification of Personal

- 17.1 Data subjects have personal data that is
- 17.2 The Company shall subject of that rectil Company of the iss case of complex reshall be informed.
- 17.3 In the event that a parties, those partie to that personal data
- 17.4 All employees, age Company working f working with is ke processed] within t system(s)>>] syster rectification, and m Officer in ensuring within the time limit.

## 18. Erasure of Personal Data

- 18.1 Data subjects have data it holds about t
  - a) it is no long with respect processed;
  - b) the data su holding and

S











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

ompany's Data Protection Officer.

r parties working on behalf of the hat all personal data that they are rever possible, only stored [and name(s) and/or description(s) of pid search and retrieval, and must ata Protection Officer in handling

he handling of normal SARs. The nable fees for additional copies of o a data subject, and for requests particularly where such requests

Company to rectify any of their e.

a in question, and inform the data of the data subject informing the tended by up to two months in the time is required, the data subject

lata has been disclosed to third ny rectification that must be made

r parties working on behalf of the hat all personal data that they are rever possible, only stored [and name(s) and/or description(s) of nable rapid and/or centralised the Company's Data Protection held by them at home is rectified

the Company erases the personal umstances:

mpany to hold that personal data hich it was originally collected or

w their consent to the Company I data;

- c) the data sub personal dat Company to details conce
- d) the personal
- e) the persona comply with
- f) [the person: providing inf
- 18.2 Unless the Compa data, all requests f informed of the era request. The period complex requests. I informed.
- 18.3 In the event that ar subject's request h informed of the disproportionate eff
- 18.4 All employees, age Company working f working with is ke processed] within t system(s)>>] syste and must coopera ensuring that any p time limit.

#### 19. Restriction of Personal D

- 19.1 Data subjects may data it holds abou Company shall reta subject (if any) that is not processed fur
- 19.2 In the event that a parties, those part processing it (unles do so).
- 19.3 All employees, age Company working f working with is ke processed] within t system(s)>>] syste application of restri Protection Officer ir not processed furth computers or device



bany holding and processing their ling legitimate interest to allow the Part 21 of this Policy for further

d unlawfully;

sed in order for the Company to on[;] **OR** [.]

nd processed for the purpose of to a child.]

Inds to refuse to erase personal hplied with, and the data subject of receipt of the data subject's up to two months in the case of required, the data subject shall be

b be erased in response to a data ird parties, those parties shall be impossible or would require

r parties working on behalf of the hat all personal data that they are rever possible, only stored [and name(s) and/or description(s) of rapid and/or centralised erasure, any's Data Protection Officer in em at home is erased within the

y ceases processing the personal ect makes such a request, the ersonal data concerning that data that the personal data in question

lata has been disclosed to third of the applicable restrictions on d require disproportionate effort to

r parties working on behalf of the hat all personal data that they are rever possible, only stored [and name(s) and/or description(s) of ble the rapid and/or centralised ate fully with the Company's Data onal data held by them at home is propriate, erasing such data from

#### 20. [Data Portability

- 20.1 The Company pro details of automated
- 20.2 Where data subject personal data in su the performance of data subjects have their personal data other data controlle
- 20.3 To facilitate the righ applicable personal
  - a) <<li>a) <</li>
  - b) <<add further
- 20.4 Where technically f be sent directly to the
- 20.5 All requests for co month of the data s months in the case required, the data s

#### 21. Objections to Personal D

- 21.1 Data subjects hav personal data base profiling), [and proc purposes].
- 21.2 Where a data subje based on its legitin immediately, unless grounds for such p freedoms, or that th
- 21.3 Where a data subje for direct marketin promptly.
- 21.4 [Where a data subj for scientific and/c subject must, under or her particular si research is necessa public interest.]

#### 22. [Automated Processing,

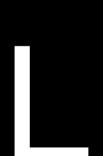
- 22.1 [The Company use as follows:
  - a) <<Insert det
- 22.2 [The Company uses
  - a) <<Insert det













sing automated means. <<Insert

nt to the Company to process their ocessing is otherwise required for company and the data subject, otection Law, to receive a copy of urposes (namely transmitting it to

Company shall make available all he following format[s]:

a data subject, personal data shall r.

hall be complied with within one riod can be extended by up to two requests. If such additional time is

the Company processing their s, for direct marketing (including pr historical research and statistics

ny processing their personal data any shall cease such processing ed that the Company's legitimate ata subject's interests, rights, and y for the conduct of legal claims.

ny processing their personal data ny shall cease such processing

any processing their personal data nd statistics purposes, the data emonstrate grounds relating to his is not required to comply if the of a task carried out for reasons of

#### aking, and Profiling

mated decision-making processes

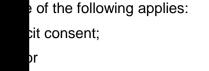
n-making>>.] ng purposes as follows:

>.]

- 22.3 The activities desc Protection Law wh significant effect on
  - a) the data sub
  - b) the processi
  - c) the process contract bet
- 22.4 If special category processing can only
  - a) the data sub
  - b) the processi
- 22.5 Where decisions an profiling), data subj request human inte an explanation of explicitly informed o
- 22.6 In addition to the a explaining the logi significance and en
- 22.7 When personal data decision-making, or
  - a) appropriate
  - b) technical and minimise the them to be e
  - all personal order to pre this Policy measures).]

#### 23. [Direct Marketing

- 23.1 The Company is su [products] AND/OR
- 23.2 The prior consent of including email, tex following limited exc
  - a) The Compa customer problem obtained in products or opportunity collected an
- 23.3 The right to objec subjects in a clear other information in
- 23.4 If a data subject of



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

generally prohibited under Data

sions have a legal or similarly

processed in this manner, such he following applies:

cit consent; or

ns of substantial public interest.

automated processing (including ject, to challenge such decisions, r own point of view, and to obtain ompany. Data subjects must be ht of contact.

nust be provided to data subjects ion-making or profiling, and the f the decision or decisions.

automated processing, automated nall apply:

I procedures shall be used;

sures shall be implemented to cour, such measures must enable

this manner shall be secured in ts arising (see Parts 25 to 30 of lata security and organisational

d regulations when marketing its

ed for electronic direct marketing ated telephone calls subject to the

text messages or emails to a mer's contact details have been the marketing relates to similar er in question has been given the g when their details were first mmunication from the Company.

hall be explicitly offered to data and must be kept separate from ity.

, their request must be complied

with promptly. A lin circumstances to marketing preference

#### 24. Personal Data Collected,

The following personal date details of data retention, place

Data Ref.	Type of Data
< <insert ref="">&gt;</insert>	< <insert data="" td="" typ<=""></insert>
< <insert ref="">&gt;</insert>	< <insert data="" td="" typ<=""></insert>
< <insert ref="">&gt;</insert>	< <insert data="" td="" typ<=""></insert>
< <insert ref="">&gt;</insert>	< <insert data="" td="" typ<=""></insert>
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< <insert ref="">&gt;</insert>	< <insert data="" td="" typ<=""></insert>
< <insert ref="">&gt;</insert>	< <insert data="" td="" typ<=""></insert>

#### 25. Data Security - Transferri

The Company shall ensure communications and other

- 25.1 All emails containin of encryption>>];
- 25.2 Employees, agents Company working practical,] only acc Company's Virtual F
- 25.3 All emails containin
- 25.4 Personal data may over unsecured r employees, agents Company working f at all times and tha security software or and routers are i Company's [Data officer>>, <<insert contact details>>] A contact details as re
- 25.5 Personal data shou wired alternative that

S









al data may be retained in such ensure that the data subject's ed with.]

processed by the Company (for y's Data Retention Policy):

e of o	data>>
e of o	data>>

#### communications

sures are taken with respect to all nal data:

encrypted [using <<insert type(s)

parties working on behalf of the [should, whenever possible and nal data when connected to the

marked "confidential";

cure networks only; transmission ted in any circumstances. All parties working on behalf of the that their home network is secure reasonably possible, any and all twork equipment such as modems ssistance is available from the insert name of data protection **D/OR [IT** Department, <<insert s), position(s), department(s), and

er a wireless network if there is a le;

- 25.6 Personal data cont should be copied fr itself should be del be deleted [using <-
- 25.7 Where personal da should be informed the fax machine to r
- 25.8 Where personal dat directly to the reci delivery service>>]. hardcopy form [exc
- 25.9 All personal data to removable electroni "confidential";
- 25.10 [<<Add further secu

## 26. Data Security - Storage

The Company shall ensure storage of personal data:

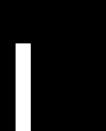
- 26.1 All electronic copi passwords and [<<
- 26.2 All hardcopies of p physical, removable cabinet, or similar equipment and/or f parties working on t be processing perso
- 26.3 All personal data st using <<insert nan stored [onsite] AN <<insert type(s) of e
- 26.4 The storage of pers laptops, tablets, an Company or otherv for the performance contractors, or othe home [must] **OR** [s process personal on Network ("VPN");
- 26.5 Personal data may processed on de authorisation of the absolutely necessar the work in questio devices belonging t the Company, pers from, or processed comply fully with th (which may include













email, whether sent or received, ail and stored securely. The email associated therewith should also n>>];

simile transmission the recipient mission and should be waiting by

hardcopy form it should be passed insert name(s) and/or type(s) of be transferred to home workers in stances.];

y, whether in hardcopy form or on red in a suitable container marked

d>>.]

ures are taken with respect to the

hould be stored securely using n>>] data encryption;

any electronic copies stored on securely in a locked box, drawer, shall provide suitable storage es, agents, contractors, or other orking from home who are likely to

be backed up <<insert interval>> backup system>> with backups ups should be encrypted [using

vices (including, but not limited to, her such device belongs to the b the extent absolutely necessary Furthermore, employees, agents, half of the Company working from le and practical] only access and b the Company's Virtual Private

b, stored on, accessed from, or nging to employees [with the ection Officer, only] to the extent the relevant work, and only where y a home worker. In the case of other parties working on behalf of ansferred to, stored on, accessed he party in question has agreed to s Policy and Data Protection Law ompany that all suitable technical

and organisational r

26.6 [<<Add further secu

#### 27. Data Security - Disposal

- 27.1 When any persona reason (including w should be securely
- 27.2 Personal data store name(s) and/or des
- 27.3 Personal data store name(s) and/or des agents, contractors working from home form at home if it is to do so, such pers dispose of it in the should under no cirr recycling.
- 27.4 For further informat refer to the Compar

## 28. Data Security - Use of Pe

The Company shall ensure use of personal data:

- 28.1 No personal data contractor, or other to any personal da should be formally contact details>>;
- 28.2 No personal data r other party, whethe not, without the a contact details>>;
- 28.3 Personal data mus unattended or on other parties at any
- 28.4 If personal data is question is to be let computer and scree
- 28.5 All employees, age Company working f to comply with Parts a specific room or p with lockable windo data. The Company ensure a degree of reasonably practica possible in the circu

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en); d>>.]

or otherwise disposed of for any nade and are no longer needed), it

e securely erased using <<insert ind/or standard(s)>>.

uld be disposed of using <<insert and/or standard(s)>>. Employees, king on behalf of the Company personal data stored in hardcopy scribed above. If it is not possible ined securely until it is possible to c, at the Company's premises and of in normal household rubbish or

disposal of personal data, please

ures are taken with respect to the

ally and if an employee, agent, of the Company requires access ady have access to, such access t name(s) and/or position(s) and

y employee, agent, contractor, or ing on behalf of the Company or name(s) and/or position(s) and

it all times and should not be left nployees, agents, contractors, or

outer screen and the computer in od of time, the user must lock the

r parties working on behalf of the hat they use all reasonable efforts cluding, for example, setting aside behind a lockable door, in a room articularly when handling personal vorkers may not always be able to the Company's premises, but all hade to ensure the best security

- 28.6 Where personal da shall be the responconsent is obtained or via a third-party s
- 28.7 [<<Add further secu

#### 29. Data Security - IT Securit

The Company shall ensure and information security:

- 29.1 All passwords used should not use wo compromised. All p lowercase letters, n is designed to requi
- 29.2 Under no circumsta between any empl behalf of the Comp is forgotten, it must access to password
- 29.3 All software (includi installed on IT equi [via remote adminisrelated updates sha updates are made a reasonably and pra not to do so];
- 29.4 All software (includi installed on IT e contractors, or othe home should be ke updates should be updates should be IT staff in order to e Automatic updates and assistance is <<insert name of **AND/OR [**IT Depa name(s), position(s)
- 29.5 No software may t without the prior ap AND/OR [<<insert required>>];
- 29.6 All employees, age Company working personally belongin software on their <<insert contact department(s), and software;





is used for marketing purposes, it n>> to ensure that the appropriate s have opted out, whether directly

d>>.]

sures are taken with respect to IT

should be changed regularly and be easily guessed or otherwise a combination of uppercase and Il software used by the Company

vords be written down or shared ors, or other parties working on prity or department. If a password pable method. IT staff do not have

plications and operating systems) Company shall be kept up-to-date y's IT staff. Any and all securitythan <<insert period>> after the or manufacturer] **OR** [as soon as s there are valid technical reasons

plications and operating systems) elonging to employees, agents, half of the Company working from me worker in question. [Software available or, as applicable, when device in question.] **OR** [Software hen authorised by the Company's do not give rise to faults or errors. elayed wherever possible.] Advice npany's [Data Protection Officer, >>, <<insert contact details>>] ct details>>] **AND/OR** [<<insert tact details as required>>].

npany-owned computer or device tment, <<insert contact details>>] artment(s), and contact details as

r parties working on behalf of the personal data on IT equipment advice on the installation of new evices from the [IT Department, [<<insert name(s), position(s), quired>>] before installing such 29.7 [<<Add further secu

## 30. Organisational Measures

The Company shall ensure collection, holding, and pro

- 30.1 All employees, age Company shall be r the Company's res Policy, and shall be
- 30.2 Only employees, ag Company that need their assigned dutie Company;
- 30.3 All sharing of perso relevant data subject be obtained prior to
- 30.4 All employees, age Company handling
- 30.5 All employees, age Company handling appropriately super
- 30.6 All employees, age Company handling exercise care, caut that relate to persor
- 30.7 Methods of collectir evaluated and revie
- 30.8 All personal data h out in the Company
- 30.9 The performance of working on behalf of evaluated and revie
- 30.10 All employees, age Company handling the principles of Da
- 30.11 All agents, contrac handling personal of are involved in th conditions as those Policy and Data Pro
- 30.12 Where any agent, c handling personal shall indemnify and damages, loss, clai
- 30.13 [<<Add further orga













d>>.]

ures are taken with respect to the

r parties working on behalf of the their individual responsibilities and Protection Law and under this his Policy;

er parties working on behalf of the personal data in order to carry out cess to personal data held by the

th the information provided to the onsent of such data subjects shall onal data;

r parties working on behalf of the ropriately trained to do so;

r parties working on behalf of the those working from home) will be hods;

r parties working on behalf of the be required and encouraged to n discussing work-related matters orkplace or otherwise;

ng personal data shall be regularly

Il be reviewed periodically, as set

nts, contractors, or other parties personal data shall be regularly

r parties working on behalf of the bund to do so in accordance with s Policy by contract;

orking on behalf of the Company by and all of their employees who hal data are held to the same the Company arising out of this

vorking on behalf of the Company tions under this Policy that party npany against any costs, liability, may arise out of that failure;

equired>>.]

#### 31. Transferring Personal Da

- 31.1 The Company ma available remotely)
- 31.2 The transfer of personly if one or more
  - 31.2.1 the transfer that country Commission for personal
  - 31.2.2 the transfer provides ap agreement rules; stand Commission by a supervi certification for in Data F by the com administrativ authorised b
  - 31.2.3 the transfer relevant data
  - 31.2.4 the transfer data subject the request
  - 31.2.5 the transfer
  - 31.2.6 the transfer
  - 31.2.7 the transfer or other inc unable to giv
  - 31.2.8 the transfer intended to access by th show a legiti

## 32. Data Breach Notification

- 32.1 All personal data b Data Protection Off personal data bein parties working on computers or device
- 32.2 If an employee, ag Company becomes occurred, they mus evidence relating to retained.
- 32.3 If a personal data b the rights and fre

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## the EEA

nsfer ('transfer' includes making s outside of the EEA.

utside of the EEA shall take place

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 ual clauses agreed and authorised ority; or provisions inserted into en public authorities or bodies ory authority;

med and explicit consent of the

rmance of a contract between the for pre-contractual steps taken at

t public interest reasons;

uct of legal claims;

e vital interests of the data subject a subject is physically or legally

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

ed immediately to the Company's nal data breaches which relate to es, agents, contractors, or other from home, using either personal he Company.

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 s (e.g. financial loss, breach of

confidentiality, disco or economic dama Information Commi and in any event, w

- 32.4 In the event that a p a higher risk than th data subjects, the subjects are informe
- 32.5 Data breach notifica
  - 32.5.1 The categor
  - 32.5.2 The categor concerned;
  - 32.5.3 The name at (or other cor
  - 32.5.4 The likely co
  - 32.5.5 Details of t Company t measures to

#### 33. Implementation of Policy

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

This Policy has been approved an

Name:	< <insert< th=""></insert<>
Position:	< <insert< th=""></insert<>
Date:	< <insert< th=""></insert<>

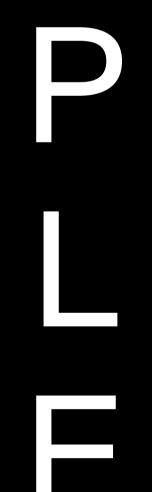
Due for Review by: <<insert</pre>

Signature:









amage, or other significant social on 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, 32.3) to the rights and freedoms of nust ensure that all affected data and without undue delay.

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 by to matters occurring on or after