



## Midlands

Haseley Office Centre  
Firs Lane, Haseley  
Warwick  
CV35 7LS

Tel: 01926 485504  
Fax: 01926 485537

### **DATA PROTECTION POLICY – SEPTEMBER 2023**

This data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personally identifiable data (PID).

We are committed to:

- Ensuring that we comply with the eight data protection principles, as listed below.
- Meeting our legal obligations as laid down by the Data Protection Act 2018 and General Data Protection Regulation 2018.
- Ensuring that data is collected and used fairly and lawfully.
- Processing PID only in order to meet our operational needs or fulfil legal requirements.
- Taking steps to ensure that PID is up to date and accurate.
- Establishing appropriate retention periods for PID.
- Ensuring that data subjects' rights can be appropriately exercised.
- Providing adequate security measures to protect PID.
- Ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues.
- Ensuring that all staff are made aware of good practice in data protection.
- Providing adequate training for all staff responsible for PID.
- Ensuring that everyone handling PID knows where to find further guidance.
- Ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly.
- Regularly reviewing data protection procedures and guidelines within the organisation.

### **The Eight Data Protection Principles**

1. PID shall be processed fairly and lawfully.
2. PID shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. PID shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. PID shall be accurate and, where necessary, kept up to date.
5. PID processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. PID shall be processed in accordance with the rights of data subjects under the Data Protection Act 2018 and General Data Protection Regulation 2018.
7. Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of PID and against accidental loss or destruction of, or damage to, PID.
8. PID shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of PID.



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### Policy Scope

This policy applies to all data that the company holds relating to identifiable individuals, which can include, but is not limited to:

- Names of individuals
- Postal Addresses
- Email Addresses
- Telephone Numbers
- Personal Likeness

### General Staff Guidelines

- Senior management are ultimately responsible for ensuring that NDC meets its legal obligations.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- Employees should keep all PID secure by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared.
- PID should not be disclosed to unauthorised people, either within the company or externally.
- PID should be regularly reviewed and updated. If no longer required it should be deleted and disposed of.
- Employees should request help from their line manager if they are unsure about any aspect of data protection.

### Data Storage

- When PID is collected on paper it should be kept in a locked / secure place where people cannot see it. This also applies to electronic data that has been printed out for whatever purpose.
- When not in use the paper or files should be kept in a locked cabinet.
- PID printouts should be shredded when no longer required.
- Where PID is stored electronically it must be protected from unauthorised access, accidental deletion and malicious hacking attempts.
- PID should be protected by strong passwords which should not be shared.
- PID should not be stored on removable media unless that is password protected.
- PID should only be stored on designated password protected drives and servers. Do not save copies to your personal computer.
- PID should be backed up frequently.



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- All servers and computers containing PID should be protected by security software and a firewall.

In accordance with our company terms and conditions survey data is stored as follows:

- Unless otherwise specified by the client, data sheets, interview forms and video footage are stored for a period of 3 months from the completion of the survey, after which time the raw data will be destroyed.
- Reports and other project related documents are stored for a period of 6 years. All information is shredded and confidentially disposed of, once the period of storage has expired.
- NDC is obliged to store PID relating to accounts, finances and payroll for six years in accordance with HMRC's guidelines, <https://www.gov.uk/running-a-limited-company/company-and-accounting-records>

"You must keep records for 6 years from the end of the last company financial year they relate to"

### Subject Access Requests

All individuals who are the subject of PID held by NDC are entitled to:

- Ask what information we hold, and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Ask for information to be removed ("withdrawal of consent")

If an individual contacts the company requesting this information, this is called a Subject Access Request (SAR). Requests from individuals should be made by email, and NDC will aim to provide the relevant data within 14 working days.

NDC will always verify the identity of anyone making a SAR before handing over any information.

In certain circumstances the Data Protection Act allows PID to be disclosed to law enforcement agencies without the consent of the data subject. Should such a request be made NDC will disclose the requested data.

### Information Commissioners Office

NDC are registered with the Information Commissioners Office (UK) – Registration Number Z1633744, and the Data Protection Commissioner (Ireland) – Registration Number DP62-x-7735372.



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This policy is fully supported by the Managing Director Gerard O'Regan and all company senior management. It will be monitored and reviewed annually.

Signed by Managing Director of Nationwide Data Collection

A handwritten signature in black ink, appearing to read 'Gerard O'Regan', is written over a horizontal line.

September 2023