

Privacy Policy- External

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Review responsibility: Operations Manager
Signature:



This document was reviewed / revised on: 11/04/2019

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This policy / procedure may be revised at an earlier date if necessary.

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Introduction

This policy provides guidance to all service users in relation to the processing of personal data under the General Data Protection Regulations brought in to force 25th May 2018. The Business is regulated by the GDPR which are monitored and audited by the Information Commissioners Office.

This policy briefly describes what we do with the personal data we process and we protect data subjects.

'Personal Data' means any information from which a person can be identified; it includes things like name, e-mail address, home address and telephone number. "Data Subject" means any individual about whom we store data.

The Business is committed to protecting the privacy of all data subjects. We will endeavour to ensure that all information provided to us and held by The Business is kept private and confidential and will only be used in order that The Business can provide the services requested by an individual as a matter of legitimate interest under the appropriate legal basis for processing the data. Our **primary** legal bases are **Consent or Contract** which means;

- We have a contract with you and need to process your personal data to comply with our obligations under that contract or we have been asked to do something by you and we need to process your personal data to do what you ask
- We need to contact you with relevant information and require your consent to do so

A full description of all the lawful bases upon which we may do business is described in our **Privacy Statement**, which can be found on our website or via the Data Protection Manager.

USES OF PERSONAL INFORMATION

The Business will only share details of data subjects within The Business (relevant employees and appointed representatives) or where necessary, with third parties such as host employers and organisations who supply training or refer service users to us.

Where the Business reasonably believes that it is required by law to disclose any personal information held by the Business to a third party, whether in compliance with any applicable law or regulation the Business may do so by court order or in connection with legal proceedings,

You are required to inform us of any changes to personal information so that the Business can keep records up to date.

SECURITY

The Business will take the necessary steps to protect personal data and will only store and transfer information securely in line with GDPR requirements. This includes electronic and hard copy data which may be held centrally or remotely and may be accessed by our employees or representatives in venues other than our normal business premises.

GENERAL

All personal data stored by The Business must be regularly reviewed to ensure it is

a) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

b) accurate and, where necessary, kept up to date.

c) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed

d) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

Any data subject has the right to find out what data the Business holds about the user and have it amended or removed if applicable.

Any service user that wishes to request further information about this privacy policy should contact the Data Protection Manager by emailing madeline@moorenetworking.net or telephone the office on 01603 737739.

The Business could need to make changes to how data is processed at any time. However, the Business will not change the way it uses personal information without telling the user in advance with an opportunity to opt out of, or prevent the new use of, personal information.

Full details of how The Business manages data and your rights as a Data Subject can be found in our **Privacy Statement** which can be found on the website or requested from the Data Protection Manager.

END