

Data Protection Policy

This Policy has been approved and authorised by:

Name: Ian Dodd

Position: Managing Director

Date: 09/09/2022

Due for Review by: 09/09/2023

Signature:

Data Protection Officer

Good Management Group are not required to have a Data Protection Officer. Our Managing Director named above assumes all associated responsibilities.

Commencement of this policy

This Policy shall be deemed effective as of 13/11/2020 however it will not have effect retrospectively and will apply only to matters occurring after this date.

Our specific data protection measures

In relation to our use of personal data Good Management Group take the following measures:

- Encryption: Good Management Group encrypt the following data in transit or at rest:
 - Employee Computers
 - Back up Hard Drive
 - Website Hosting Service
 - Mobile Phone
 - Cloud Services
 - Website traffic
- Erasure, destruction and or deletion: Digital deletion or physical shredding.
- Transmission of hard copies: Signed for service with tracking
- Storage of emails and email content: Cloud services, webhosting services, company computers and backup hard drive.
- Access of third parties: Approved Suppliers List and Data Access Procedure
- Storage of hardcopies: Unless legally required to retain hard copies of documents, all are digitised and hardcopies destroyed as above. Hardcopies that have to be stored are locked in a locker onsite.
- Storage of electronic copies: Electronic copies of personal data are stored and encrypted as above.
- Sharing: Approved Suppliers List and Data Access Procedure
- Sub-processing: Approved Suppliers List and Data Access Procedure
- Viewing on systems: Data Access Procedure
- Viewing on devices: Data Access Procedure
- Passwords: All employees use a password manager approved by the company

Our use of personal data and our purpose

Good Management Group may collect, hold and/or process the following personal data:

- Name: To enable us to refer to you by name when contacting you.
- Job Role: To ensure Good Management Group only contact you with information Good Management Group think is relevant to your job role.
- Employer: So Good Management Group know who you work for and can make sure Good Management Group only contact organisations Good Management Group believe will benefit from our services.
- Email Address: This is our primary form of direct communication for our mailing list, first point of contact following a referral and communication of proposals and general business information once a contract has been signed.
- Phone Number: Good Management Group may follow up with prospective clients once an initial email contact has been made, during the proposal development or following a proposal submission. Calls may also be used during contract delivery.

Section A: Overview

1. The reason for this policy

- 1.1 You have legal rights with regard to the way your personal data is handled.
- 1.2 In the course of our business activities Good Management Group collect, store and process personal data about our customers, suppliers and other third parties and therefore, in order to comply with the law and to maintain confidence in our business, Good Management Group acknowledge the importance of correct and lawful treatment of this data.
- 1.3 All people working in or with our business are obliged to comply with this policy when processing personal data.

2. Introduction

- 2.1 This policy and any other documents referred to in it sets out the basis on which Good Management Group will process any personal data Good Management Group collect from data subjects, for example, customers and business contacts, or that is provided to us by data subjects or other sources.
- 2.2 In this policy when Good Management Group say “you’ or “your” Good Management Group are generally referring to the data subjects unless the context requires otherwise.
- 2.3 It also sets out our obligations in relation to data protection under the General Data Protection Regulation 2016 (“the **GDPR Rules**”).
- 2.4 This policy sets out rules on data protection and the legal conditions that must be satisfied when Good Management Group obtain, handle, process, transfer and store personal data.
- 2.5 Good Management Group agree to ensure that all of our directors, employees, consultants and agents comply with this policy.
- 2.6 Good Management Group aim to ensure the correct, lawful, and fair handling of your personal data and to respect your legal rights.

3. The meaning of key Data Protection terms

- 3.1 **data** is information which is stored electronically, on a computer, or in certain paper-based filing systems.
- 3.2 **data subjects** for the purpose of this policy include all living individuals about whom Good Management Group hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.
- 3.3 **personal data** means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.
- 3.4 **data controllers** are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with the Act.

Good Management Group are the data controller of all personal data used in our business for our own commercial purposes.

- 3.5 **processing** is any activity that involves use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

4. **Summary of the Data Protection Principles**

This Policy aims to ensure compliance with the GDPR Rules. The GDPR Rules sets out the following principles with which any party handling personal data must comply. All personal data must be:

- a) **Processed fairly and lawfully** – it must be processed fairly and lawfully and it must be processed - in relation to you as the data subject - in a transparent manner
- b) **Processed for limited purposes and in an appropriate way** - the purposes for which it is collected must be explicit, specified and legitimate
- c) **Adequate, relevant and not excessive for the purpose**
- d) **Accurate** – as well as being accurate it must be kept up to date with inaccurate data deleted
- e) **Not kept longer than necessary for the purpose**
- f) **Processed in line with data subject's rights**
- g) **Security** – there must appropriate technical or organisational measures to ensure appropriate security

In addition, personal data must not be transferred outside the European Economic Area (the “EEA”) without adequate protection.

Section B: Data Protection Principles

5. Notifying Data Subjects

5.1 As part of complying with the principles in para 4 above, if you provide us with personal data Good Management Group will always try to tell you:

5.1.1 the purpose or purposes for which Good Management Group intend to process that personal data

5.1.2 the types of third parties, if any, with which Good Management Group will share or to which Good Management Group will disclose that personal data

5.1.3 how you can limit our use and disclosure of their personal data

5.1.4 if Good Management Group receive personal data from other sources.

6. Lawful, Fair, and Transparent Data Processing

The GDPR Rules are not intended to prevent the processing of personal data but to ensure that it is done fairly and without adversely affecting your rights. The processing of personal data is lawful if one (or more) of the following applies:

a) **(consent)** the data subject has consented for a specific purpose;

b) **(contract)** if the data subject requests the processing with a view to entering into a contract or the processing is necessary for the performance of a contract

c) **(legal obligation)** if the processing is necessary for the compliance with a legal obligation to which the data controller is subject

d) **(protection)** processing is necessary to protect your vital interests or those of another natural person

e) **(public interest)** it is in the public interest for a task to be carried out which requires such processing, or the task is to be carried out as a result of the exercise of any official authority held by the data controller;

f) **(legitimate interests)** for the legitimate interest of the data controller or the party to whom the personal data is disclosed.

7. Processed for limited purposes and in an appropriate way

7.1 In the course of our business, Good Management Group may collect and process the personal data set out above. This may include personal data Good Management Group receive directly from you (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data Good Management Group receive from other sources (including, for example, business partners, sub-contractors in technical, payment and delivery services, credit reference agencies and others).

7.2 Good Management Group will only process personal data for the specific purposes set out above or for any other purposes specifically permitted by the GDPR Rules. Good Management Group will notify those purposes to you when Good Management Group first collect the personal data or as soon as possible thereafter.

8. **Adequate, Relevant and not excessive for the purpose**

Good Management Group will only collect and process personal data for the specific purpose(s) set out above.

9. **Accuracy of Data and Keeping Data Up To Date**

Good Management Group will keep your personal data accurate and up-to-date. Good Management Group will check its accuracy regularly. When Good Management Group find inaccurate or out-of-date data Good Management Group will take reasonable steps to amend or erase that data.

10. **Timely Processing**

Good Management Group will only keep your personal data for a period of time which Good Management Group judge is relevant and necessary taking into account the purpose(s) of collecting the personal data which are specified above.

11. **Processing that is secure**

In addition to the measures above:

- 11.1 Good Management Group will make sure that the personal data Good Management Group collect is securely kept and Good Management Group stop unauthorised processing and prevent its loss, destruction or damage
- 11.2 Good Management Group will ensure that only people who are authorised to use personal data can access it and that Good Management Group have entry controls to our premises and systems, lockable desks and cupboards for confidential personal data and destruction of hard copy documents and digital storage devices
- 11.3 all authorised persons must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

Section C: Data Subject Rights

12. You, as a data subject, have the right to information about:
- a) who Good Management Group are
 - b) the purpose(s) of collecting your personal data and the legal basis for collecting it and what our legitimate interest is for processing your personal data
 - c) the categories of personal data collected and where is to be transferred, especially if outside the EEA
 - d) the length of time Good Management Group hold personal data (or, where there is no predetermined period, details of how that length of time will be determined)
 - e) your rights as a data subject including your right to withdraw your consent to processing, the right to complain to the Information Commissioner and also things such as details of any legal requirement for processing personal data that may exist and any automated decision-making that Good Management Group carry out.

Good Management Group will try to provide this information when Good Management Group collect the personal data or, if Good Management Group collect the personal data from another party, when Good Management Group communicate with you after the personal data is received.

13. **Data Subject Access**

- 13.1 You may request access to any data held about you by us (a subject access request (“**SAR**”))
- 13.2 Good Management Group reserve the right to charge reasonable fees for onerous or repetitive requests.
- 13.3 Data subjects must make a formal request for information Good Management Group hold about them. This must be made in writing.
- 13.4 When receiving telephone enquiries, Good Management Group will only disclose personal data Good Management Group hold on our systems if the following conditions are met:

Good Management Group will check the caller's identity to make sure that information is only given to a person who is entitled to it.

- a) Good Management Group will suggest that the caller put their request in writing if Good Management Group are not sure about the caller's identity and where their identity cannot be checked.

14. **Accuracy of personal data: right to rectification**

- 14.1 Good Management Group will do our best to ensure that all personal data held about you is accurate and complete. Good Management Group ask that you notify us of any changes to information held about you.
- 14.2 You have the right to request that any incomplete or inaccurate information held about you is rectified and to lodge a complaint with us and the Information Commissioner's Office.

14.3 Good Management Group will respond to requests to rectify within one month.

15. **Right to be forgotten**

You have the right to request the deletion or removal of personal data however requests for erasure can be rejected in certain circumstances.

16. **Right to restriction of Processing**

You can block the processing of your personal data. This means Good Management Group may be able to store it, but cannot process it further without consent. Restricting data is required where the accuracy of data is challenged - but only until the accuracy has been verified.

17. **Right to data portability**

17.1 If you have provided personal data to us you have the right to transfer it from us to someone else.

17.2 If you request it, Good Management Group may be required to transmit the data directly to another organisation if feasible. Good Management Group must respond without undue delay and within one month, or two months if the request is complex.

18. **The right to object**

You have a right to object to the processing of your data. Good Management Group must stop processing unless Good Management Group can demonstrate a legal ground for the processing.

19. **Automated decision-making**

19.1 You have the right not to be subject to a decision based on automated processing and it produces a legal effect or other significant effect on you.

19.2 You can request human intervention where personal data is processed using automated decision-making and can ask for an explanation of the decision to use automated decision-making.

20. **Profiling**

If Good Management Group use your personal data for profiling purposes:

- a) Good Management Group will give you information fully explaining the profiling which will be carried out including its importance and the likely results of that profiling;
- b) Good Management Group will make sure that appropriate mathematical or statistical procedures will be used;
- c) Good Management Group will implement technical and organisational measures which are required to minimise the risk of mistakes and to enable such mistakes to be easily corrected; and
- d) Good Management Group will make sure that all personal data processed by us for profiling purposes will be kept secure so as to avoid discriminatory effects resulting from such profiling.

Section D: Our Other Obligations

21. **How Good Management Group deal with personal data internally**

21.1 Good Management Group will:

train our employees in relation to our responsibilities under the GDPR Rules

- a) ensure that only appropriately trained, supervised and authorised personal have access to personal data held by us; and
- b) regularly evaluate and review our collection and processing of personal data and the performance of employees and third parties working on our behalf to ensure that it is in accordance with the GDPR Rules.

21.2 Good Management Group will keep internal records of personal data that Good Management Group collect and process including, in relation to that personal data, details of the categories, any transfers, our security measures, our purpose of collection and the duration of retention of that personal data. Good Management Group will also retain details of all third parties that either collect your personal data for us or that Good Management Group use to process your personal data.

21.3 Good Management Group will carry out privacy impact assessments as required by law.

22. **Transferring personal data to a country outside the EEA**

Good Management Group may transfer personal data to countries outside of the EEA however Good Management Group will ensure that the transfer is:

- a) to a place that the EU has judged to provide adequate levels of protection for personal data
- b) to a place that provides adequate safeguards under either an agreement with a public body, rules that bind companies or standard data protection clauses adopted by the EU or some other form of approved code of conduct approved by a supervisory authority or certification or other contractual clauses or regulatory provisions
- c) necessary for the performance of a contract between you and us or with a view to creating that contract
- d) made with your consent
- e) necessary for important public interest reasons, legal claims, to protect your vital interests

23. **Notification of personal data security breach**

23.1 If a personal data security breach occurs, Good Management Group will manage and respond to it effectively in accordance with GDPR and it must be reported immediately to our Managing Director.

23.2 Good Management Group will notify the Information Commissioners Office (**ICO**) and any data subject of personal data security breaches to the extent Good Management Group are required to do so by GDPR.

- 23.3 If disclosure is not required by GDPR, Good Management Group will nevertheless investigate closely all the circumstances surrounding the breach and examine the seriousness of the breach and the benefits that might be obtained by disclosure (such as limiting risks of fraud) and Good Management Group will give careful consideration to any decision to notify the ICO or you, especially if your rights and freedoms as data subjects are affected.