



DATA PROTECTION POLICY

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Distribution List

A copy of the Data Protection Policy is made available to all Profile employees.

Version Control

Version	Comments	Review Date
V1.0	Original version	01/12/2007
V2.0	Annual Review	03/12/2008
V3.0	Annual Review	02/12/2009
V4.0	Policy Review (to bring in line with Annual Company Policy Review)	02/07/2010
V5.0	Policy Review	02/08/2011
V6.0	Policy Review	09/07/2012
V7.0	Policy Review	01/07/2013
V8.0	Policy Review	02/07/2014
V9.0	Policy Review	13/07/2015
V10.0	Policy Review	04/07/2016
V11.0	Policy Review	14/07/2017
V12.0	Policy Review	18/07/2018
V13.0	Policy Review	19/07/2019
V13.1	Revised Layout & Policy Review	24/07/2019
V13.2	Policy Review	08/07/2020
V14	Policy Review & Pro Doc Number Added	09/09/2020

Data Protection Number

Profile is registered with the Information Commissioner under registration number: Z6672196.

Background

The Data Protection Act 1998 regulates the processing of information relating to living and identifiable individuals. This includes the obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems and card indexes.

Data users must comply with the data protection principles of good practice which underpin the Act. Personal data must be:

- △ Obtained and processed fairly and lawfully
- △ Held only for specified purposes
- △ Adequate, relevant and not excessive
- △ Accurate and up to date
- △ Not kept longer than necessary
- △ Processed in accordance with the Act
- △ Kept secure and protected
- △ Not transferred to countries without adequate data protection.

It is Profile's policy that all personal data will be held in accordance with the principles and requirements of data protection and other relevant legislation, and that procedures will be put in place to ensure the fair processing of data subjects. Profile and all staff who process or use personal data must ensure that they abide by these principles at all times.

The company is the data controller under the Act and is therefore ultimately responsible for implementation. However, day to day matters, notification, contact with the Information Commissioner, ensuring that this data protection policy and compliance is reviewed at appropriate intervals and the handling of subject access requests will be dealt with by the Data Protection Officer, Chris McKay.

Relevant data protection issues will be included in all induction and training.



Information Held by Profile

Information held by Profile relates to private and public sector contracts on which we work and to individuals (including employees, Management Team members, trainers and consultants, current, past and potential) who support, assist, provide services to or work within or alongside Profile.

Profile will ensure that individuals know enough about how the information held about them is used or disclosed. Information held about individuals will only be collected and recorded with good reason. It will be stored securely and for only as long as required.

Relevant data protection issues will be included in all induction and training, and an internal audit of data protection compliance will be carried out at appropriate intervals.

Profile will not give out information about any individual over the telephone or by e-mail unless it is satisfied that the individual knows that this type of disclosure may be made and/or the information is already in the public domain or that there is some overriding reason for the disclosure.

Information about individuals will not be published in any type of directory without the written consent of the individual.

No details of individuals will be passed to other organisations for marketing, fundraising or information purposes unless the individual has been informed that this might happen and has been given the opportunity to opt-in or opt-out as appropriate.

Profile's website will not contain any personal data that is not absolutely necessary. Where information is captured on the website, a clear policy statement will be provided, and no personal data will be captured without the knowledge of the data subject.

Photographs, recordings, videos or DVDs in which individuals are identifiable will only be used with their explicit written consent.

Manual files containing sensitive information about individuals will be labelled confidential and kept in locked filing cabinets, accessible only to relevant staff and the Chief Executive.

Computer files containing sensitive information about individuals will be password protected, accessible only to relevant staff and the Chief Executive.

Information no longer required will be disposed of appropriately including ensuring that data is non-recoverable from any computer system.

Personnel Records

The names of Profile's staff and details of the roles they hold are considered to be in the public domain and may be made freely available in any format to anyone.

The names of Profile's Management Team, and details of their organisation and roles, are considered to be in the public domain and may be made freely available in any format to anyone.

The address, telephone number, fax number, and email address of Management Team members shall be made available only to staff and other Management Team members and only for the purpose of making contact in furtherance of the company's governance.

The home and mobile telephone numbers of staff are confidential but shall be made available to other staff members for the purpose of making contact in an emergency or urgent work related matter.

All material in respect of all applicants, other than the successful applicants, gained during the selection of staff is confidential and shall be retained for twelve months after the effective start date of the staff member, at which point it shall be destroyed.



All information required for the purposes of payroll is confidential and made available only to the Managing Director, the Chief Executive and the Finance and HR staff. Information will be passed to relevant statutory bodies if there is a legal requirement, such as those relating to tax or national insurance.

All other information held within personnel records is confidential and can only be made available to the HR staff, Managing Director and the Chief Executive. Personnel records are only used for matters connected with the individual's employment at Profile or to help with references the company might write in future at the individual's request.

Information about gender, geographical location, ethnicity, sexual orientation and disability of staff is kept for the purposes of monitoring our equal opportunities policy.

Individuals will be given full open access to their complete personnel records without question. Further details of access requests are detailed within the 'Access to Information' section below.

Databases of Organizations and Other Contacts

Data about individuals (including those who are contacts for organisations) shall be confined to contact details and information directly relevant to the reason for their inclusion on the company's databases (for example if they are participating in a training programme). Other information about organisations may be held provided this is not personal data.

Information about gender, geographical location, ethnicity and disability of users (individuals and management team members) will be kept anonymous and collected, inputted and filed separately from any other details or information that might identify an individual. The information is collected for the purposes of monitoring our equal opportunities policy.

Data about individuals shall be deleted on the request of the individual when the data is no longer used or required by the company for legal, financial or contractual reasons.

Data about individuals shall only be used by Profile for:

- ▲ Circulating Profile's publications and other information about the company and its work, via regular mailings to all on that particular database
- ▲ Direct marketing of Profile's training, events or services to selected individuals/organisations, unless the individual/organisation has opted out of receiving direct marketing
- ▲ Providing contact details for a specified organisation when requested or when it is considered that another organisation offers a service of benefit to users, unless that individual/organisation has requested that all or some of the contact details not be made available outside the company
- ▲ Any other reason which has been specifically agreed with that individual/Profile in advance.

Data about individuals shall not be used for direct marketing if the individual has exercised their right to opt out of this.

The following statements should be used on membership forms, order forms, subscription forms, HR personal details forms, as listed below:

- ▲ You do not have to provide any of the following information but it will contribute to our equal opportunities monitoring. It is collected in order to monitor the diversity of people we work with.
- ▲ Profile will use the information you have provided here for the purpose of giving you information about the company's training courses, services and events.
- ▲ Information you provide will not be disclosed outside our organisation, except where necessary in order to facilitate the training. All participants are given a list of participant's names and organisations but no further details.

If you do not want us to contact you in future about the company's training courses, services and events, please tick this box

Information that you choose to give on special needs will be passed to the trainer, if relevant, so that we can make your participation as rewarding as possible. We will not retain the data after the course.

If you have any query about the use we make of your data, please contact Chris McKay.



Access to Information

Data Subject Access requests should be made in writing, signed by the individual, and addressed to Chris McKay.

In response to a Data Subject Access request, the company aims to disclose as much information as possible within 28 days, while respecting the right of any third party to maintain confidentiality wherever reasonable.

In most cases, subject access requests will be free of charge. However, where the request is manifestly unfounded or excessive, you may be charged a "reasonable fee" for the administrative costs of complying with the request. You may also be charged a reasonable fee if you request further copies of your data following a request.

Queries

Any queries or questions relating to this policy should be forwarded to the company's Data Protection Officer, Chris McKay, e-mail: chris.mckay@profilesecurity.co.uk.