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Data Protection Policy

Peter Bates Associates Ltd is fully committed to comply with the General Data Protection Regulation (GDPR) 2016, and its six principles¹ as set out below:

GDPR Principle	Detailed requirements	Additional practical arrangements at Peter Bates Associates Ltd
1 Data must be processed lawfully, fairly and in a transparent manner in relation to individuals.	<ul style="list-style-type: none">• Maintain an awareness of legal obligations regarding data protection.• Maintain registration with the Information Commissioner's Office• Employ systems to implement and check compliance with the law.• Communicate these matters via a Privacy Notice on website.• Obtain and record evidence of consent through opt-in arrangements, while ensuring that people can easily withdraw consent and know how to do this.• Arrange separate consent processes for separate items.	<ul style="list-style-type: none">• Peter Bates has completed the NHS Digital e-learning package 'Data Security Awareness Level 1'.• Up to date registration with the ICO - reference: A8350175.• Privacy Notice is on the company website here.• Data Flow Map created and maintained by the company. Current contractual contacts fall under "legitimate Interest" and therefore don't need consent. Project and event attendees need to give consent to allow the company to send them any further information. This takes place when the person emails the company to ask for specific information.• Company is compliant.
2 Data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.	<ul style="list-style-type: none">• Meet its legal obligations to specify the purposes for which information is used	<ul style="list-style-type: none">• People who have given the company their business card or sent us an email expressing interest in an area of work have demonstrated their consent to be contacted about things appropriate to their role. This meets the requirement of legitimate interest.• Company is compliant.

¹ See Article 5 of the GDPR.

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3 Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.	<ul style="list-style-type: none"> Collect and process appropriate information only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirements 	<ul style="list-style-type: none"> Company is compliant.
4 Data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.	<ul style="list-style-type: none"> Ensure the quality of information used Ensure that people have the right to be informed that processing is being undertaken, to access one's personal information; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as incorrect. To provide for Subject Access Requests. 	<ul style="list-style-type: none"> Electronic data retained on computers, mobile phones and scanners is disposed of through the secure degaussing services of a company such as Shredall. Company is compliant.
5 Data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.	<ul style="list-style-type: none"> Appropriate technical and organisational security measures safeguard personal information Ensure that the information is held for no longer than is necessary Once the task for which the personal data is held is complete, personal information on paper will be disposed of securely by use of a crosscut shredder and electronic data will be deleted. 	<ul style="list-style-type: none"> Any personal data that is not needed for legitimate business activities is deleted. Company is compliant.

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6 Data must be 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.	<ul style="list-style-type: none"> • Personal data kept in electronic forms to be password protected and regularly backed up, while paper copies of personal information are avoided wherever possible, but where required will be stored in a locked cabinet. • Electronic data will be protected from malicious software. • Protect computers from physical harm, theft and damage. • Publicise and abide by individuals' right to appeal or complain to the Information Commissioner's Office in the event that agreement cannot be reached in a dispute regarding data protection • Ensure that personal information is not transferred abroad without suitable safeguards. 	<ul style="list-style-type: none"> • Data stored on computer is password protected and backed up. Equipment is degaussed where appropriate prior to disposal. • Company is compliant.