

NewmanFrancis Ltd

PRIVACY POLICY

The purpose of this document is to describe the rules and procedures associated with the transportation of personal sensitive data and procedures to be followed in circumstances whereby access to NewmanFrancis Ltd data is required by third parties

Any queries arising from this Policy or its implementation can be taken up directly with the Directors at Flat 1, 46 Earlham Grove Forest Gate E7 9AW.

Data means information which –

- (a) is being processed by means of equipment operating automatically in response to instructions given for that purpose,
- (b) is recorded with the intention that it should be processed by means of such equipment,
- (c) is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system,
- (d) does not fall within paragraph (a), (b) or (c) but forms part of an accessible record as defined by section 68, or
- (e) is recorded information held by a public authority and does not fall within any of paragraphs (a) to (d).

Personal data means data which relate to a living individual who can be identified –

- (a) from those data, or
- (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

It is important to note that, where the ability to identify an individual depends partly on the data held and partly on other information (not necessarily data), the data held will still be “personal data”

Sensitive personal data means personal data consisting of information as to -

- (a) the racial or ethnic origin of the data subject,
- (b) his political opinions,
- (c) his religious beliefs or other beliefs of a similar nature,
- (d) whether he is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
- (e) his physical or mental health or condition,
- (f) his sexual life,
- (g) the commission or alleged commission by him of any offence, or
- (h) any proceedings for any offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in such proceedings.

Personal and sensitive data

In the context of this Policy, data means personal information in NewmanFrancis Ltds care. The information may be held or moved in a number of different ways, such as:

- Paper
- Floppy / hard disk
- Memory stick
- CD-Rom and DVD
- Email
- Over the telephone
- By video conference
- Photographs
- Microfilm
- Computer systems

What we collect

NewmanFrancis Ltd may collect the following information:

- Name
- Contact information including email and SMS details
- Gender
- Race
- Demographic information such as postcode, preferences, interests and opinions
- Other information relevant to customer

What we do with the information we gather

NewmanFrancis Ltd require this information to understand needs and provide a better service, and in particular for the following reasons:

- As part of NewmanFrancis Ltd service to clients
- Internal record keeping.
- To improve NewmanFrancis Ltd products and services. Or assist clients to improve their products/services
- NewmanFrancis Ltd may periodically send emails regarding news and events, which are thought, may be of interest using the email address provided.
- NewmanFrancis Ltd may also use information to contact people for market research purposes. This might be by email, phone, or mail. This information may be used to customise the website according to interests.
- Provide information to the relevant client to enable them to engage with individuals and/or to better understand their needs and priorities.

Risks and impact

There are a number of risks associated with the transportation, sharing and transfer of data, including but not limited to:

- Information being lost, damaged or intercepted in transit, e.g. stolen/lost laptops or memory sticks, opened envelopes.
- Delivery service delivering mail incorrectly
- Information being sent to the wrong address or being intercepted when sent by email, post or fax.
- Information received within the organisation but delivered to the wrong person.
- Confidential conversations being overheard.
- Personal information not being disposed of appropriately.

These and other risks have the potential to impact on:

- The individuals whose information has been put at risk
- Staff whose actions placed the information at risk. Their actions may lead to disciplinary action, and there may also be legal implications.
- The organisation itself may experience a lack of public trust and confidence, and there is potential for prosecution under information legislation.

General rules

NewmanFrancis Ltd has an obligation to its customers to safeguard their personal details and other information, and data security is the personal responsibility of all NewmanFrancis Ltd staff, contractors or sub-contractors and those working on behalf of NewmanFrancis Ltd .

In order to meet this obligation, employees must be aware of the following general rules:

- In line with NewmanFrancis Ltd Data Protection Policy, all staff, contractors or sub-contractors and those working on behalf of NewmanFrancis Ltd have a responsibility to comply with the Data Protection Act 2018, General Data Protection Regulation (GDPR) and, and therefore must take responsibility for any personal data they have in their possession.
- Staff, contractors or sub-contractors and those working on behalf of NewmanFrancis Ltd must never access data unless it is part of their job and there is a business need to do so.
- Before making data available to anyone else, staff, contractors or sub-contractors and those working on behalf of NewmanFrancis Ltd must ensure that authority is sought to release it.
- Procedures should be in place for the receipt of confidential / sensitive information, ensuring it remains secure and protected.
- Any hard copies of data containing sensitive data must be shredded and disposed in a secure manner.
- Electronic data physically transported between sites, departments or organisations must be properly packaged and clearly labelled to ensure it is handled correctly, and not corrupted by magnetic fields or other environmental damage.
- Data must never be left unattended on desks.
- Computers must always be “locked” when left unattended.

Disclosure of data by telephone / SMS

- Data must never be given out over the phone or by any other verbal means unless it is absolutely clear who the data is being given to and that they are entitled to that data and are ready and able to accept it. Use of a security word should also be considered to validate information sharing where appropriate.
- Voicemail messages containing personal information must only be left after due consideration has been given to the security and confidentiality risks involved.
- Recorded phone messages containing confidential information must be secured by password access. There should be a deputy and / or group password for times of absence.
- If using text (SMS) messages for personal information, the recipient's consent to be being contacted in this way must be obtained.

Disclosure of data by Fax

- If sending personal information by fax, pre-programmed speed-dialing must not be used, and top sheets must be clearly marked "Private and Confidential", together with the number of pages being sent and the contact details of the sender.
- A time must be agreed with the recipient for the sending of the fax, and confirmation of delivery or non-delivery must be given.
- A confirmation sheet must be printed and filed appropriately. The fax machine should also be checked to ensure that its memory does not retain a record of the transmission.

Disclosure of data by external and internal mail

- Information transported by surface mail must be by recorded delivery and must be protected from unauthorised access and environmental damage. External organisations should be requested to use secure post when forwarding confidential information, using tamper-evident packaging when possible.
- When using internal mail confidential information must be placed in clearly identifiable envelopes and must be protected from loss and accidental viewing, using lockable storage equipment where appropriate.

Transfer and sharing of data

- Personal data must not be downloaded to mobile devices such as laptops, PDA's, USB sticks, CD's etc, or emailed as an attachment or in the body of an email sent to an external address without secure protection such as encryption. Files should be password protected and password sent in a separate email.
- Staff, contractors or sub-contractors and those working on behalf of NewmanFrancis Ltd must only send what is absolutely required to be sent.

Questions to consider:

1. Do you know what the data contains?
 2. Are you sure you have the authority to send the data?
 3. Does the data need to be sent at all?
 4. Are you certain you are sending only what you absolutely need to and no more?
- The company or individual working with or on behalf of NewmanFrancis Ltd must be made aware of NewmanFrancis Ltd Data Protection Policy in the case of personal data, and must be required to complete NewmanFrancis Ltd Confidentiality Agreement and comply with all of its requirements.
 - If a CD or other removable storage device is to be sent to the company or individual, this must be by Recorded Delivery.
 - The name and address of the recipient must be entered clearly on the envelope or parcel, which must be marked "Private and Confidential" and be securely packaged to prevent loss or damage during transit.
 - The data must not be supplied until the company or individual has been made aware of NewmanFrancis Ltd Data Protection Policy in the case of personal data, and has completed NewmanFrancis Ltd Confidentiality Agreement and agreed to comply with all of its requirements.
 - Email is **not** a secure means of communication and **must not** be used for sending personal or sensitive data. Unless data is encrypted. This should be a password protected document and password sent separately.
 - Even when emailing within the security of NewmanFrancis Ltd network it is important to ensure the name and email address of the recipient is correct and that a suitable subject line is used which does not include personal information.
 - The sender must also ensure that the recipient is expecting the information and also confirm that it has been received successfully.
 - Care must also be taken when copying or forwarding emails to other and multiple addresses, as doing so may result in unauthorised or inappropriate disclosure of the information to third parties. If in doubt bcc recipients in to email.
 - All staff, contractors or sub-contractors and those working on behalf of NewmanFrancis Ltd of NewmanFrancis Ltd must include on their email signature CONFIDENTIALITY NOTICE

NFL Website

Security

NewmanFrancis Ltd are committed to ensuring that information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information which is collected online.

How we use cookies

A cookie is a small file which asks permission to be placed on a computer's hard drive. Once agreed, the file is added and the cookie helps analyse web traffic or lets informs when a particular site is visited. Cookies allow web applications to us respond to an individual. The web application can tailor its operations to needs, likes and dislikes by gathering and remembering information about a persons preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide a better website, by enabling us to monitor which pages are found to be useful and which are not. A cookie does not give us access to a personal computer or any information about a person, other than the data shared with us.

Cookies can be accepted or declined. Most web browsers automatically accept cookies, but they can be modified using browser settings to decline cookies if preferred. This may prevent person taking full advantage of the website.

Links to other websites

The NewmanFrancis Ltd website may contain links to other websites of interest. However, once a person uses these links to leave theNewmanFrancis Ltd site, control over that other website is not the responsibility of NewmanFrancis Ltd . Therefore, the protection and privacy of any information which is provided whilst visiting such sites are not governed by this privacy statement.

Controlling personal information

NewmanFrancis Ltd will not sell, distribute or lease personal information provided to third parties unless permission is sought or are required by law to do so. NewmanFrancis Ltd may use personal information provided to send promotional information about third parties which may be of interest if permission sought to do so.

Details of personal information which we hold may be requested under the Data Protection Act 2018 . A copy of the information held on a person should write to Flat 1, 46 Earlham Grove Forest Gate E7 9AW. If it is believed that any information we are holding on is incorrect or incomplete, a person should write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

I confirm I have read and agree to abide by the rules set out in this policy

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| Signed | Date |
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