

## Privacy Policy

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### INTRODUCTION

Anyone who obtains personal data about other individuals is a 'data controller' and is thus regulated by the General Data Protection Regulation 2018 (GDPR). The Regulation controls what can lawfully be done with personal data. Personal data is any information which can identify an individual. This can include any of the following:

- Name
- Date of Birth
- Address
- Email address (personal or business)
- IP address

This list is not exhaustive.

Greyfriars Project Management Ltd is a small company, without the need for a Data Protection Officer and with few pieces of personal information stored. That said, we take the protection of our employees and clients' data very seriously.

### INFORMATION WE HOLD

In order to continue to undertake our work, we hold certain information about our clients and suppliers. This information includes:

- Name
- Company
- Address
- Email address
- Telephone number
- Bank details
- Credit check reports

The business does not keep records of 'sensitive data' for our clients or suppliers.

We will regularly review the types of data that we store and ensure that they are appropriately protected.

## **HOW WE USE THE DATA WE HOLD**

The data we hold will only be used for the purpose for which we were given the information. We will never sell the data we hold on our clients or suppliers to third parties. We may occasionally send data subjects information on new legislation which we believe may be of interest, information on new services which we offer or other news regarding the business which may be of interest.

You may choose to opt out of any marketing communications at any time by emailing us at [info@greyfriarspm.com](mailto:info@greyfriarspm.com) or writing to us at Greyfriars Project Management Ltd, 38 Surrey Street, Norwich, NR1 3NY.

## **OUR OBLIGATIONS**

Below is a summary of the legal obligations imposed upon us and the rights that you have under the General Data Protection Regulation 2018 together with our policies about those rights and obligations.

The principles for processing personal data are:

1. Lawfulness, fairness and transparency;
2. Purpose Limitation;
3. Data minimisation;
4. Accurate;
5. Storage limitation i.e. not kept longer than necessary;
6. Integrity and confidentiality.

We are committed to following these principles and to ensuring all our data processing in relation to data of which you are the subject is lawful. We will take all reasonable steps to ensure that the data we process is accurate. We will retain the data for as long as we are providing you a service, are likely to provide a service due to an enquiry we have received or you are providing us a service.

We will process data in accordance with your rights under the GDPR.

Data will be kept in a secure system whether manual or computerised at all times. Greyfriars Project Management Ltd has security measures in place to minimise data breaches. Our IT systems include advanced protection from viruses and cybercrime, and tools to keep information private and secure. This includes laptop and mobile phone password protection, firewalls to protect against external threats, and files password protected where required to protect sensitive information. We are currently working towards Cyber Essentials accreditation.

We will ensure that as part of any procurement process, we check that suppliers and contractors are GDPR compliant.

## **YOUR RIGHTS UNDER THE ACT**

The GDPR gives individuals certain rights to control how information about them is obtained, used, stored and distributed. These rights are:

- the right to be informed
- the right of access
- the right to rectification

- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- rights in relation to automated decision making and processing.

## **RECTIFICATION OF DATA**

Individuals are entitled to have inaccurate personal data rectified, or completed if it is missing. This request can be made in writing or verbally. Greyfriars Project Management Ltd will rectify data within one month and free of charge.

If the request is manifestly unfounded or excessive, taking into account any repetitive nature, Greyfriars Project Management Ltd has a right to refuse to deal with the request or to charge a reasonable fee. The fee will be based on administrative costs involved in complying with the request.

## **RIGHT OF ACCESS**

If the data subject wishes to access the data we hold, the data subject must provide Greyfriars Project Management Ltd with any information reasonably requested to enable us to be satisfied as to the data subject's identity and in order to locate the information.

Where disclosure of data would necessarily mean that information relating to a third party would be disclosed Greyfriars Project Management Ltd may refuse to disclose it unless the third party consents or it is reasonable to disclose the information without such consent.

## **DIRECT MARKETING**

You have the right to require in writing that Greyfriars Project Management Ltd cease or not begin processing data of which you are the subject for the purpose of direct marketing within a reasonable time. Failure to comply by us can lead to a court order.

To opt out of any marketing communications, email us at [info@greyfriarspm.com](mailto:info@greyfriarspm.com) or write to us at Greyfriars Project Management Ltd, 38 Surrey Street, Norwich, NR1 3NY.

## **RIGHT TO ERASURE**

You have the right to require that Greyfriars Project Management Ltd cease or not begin data processing where the processing is causing or likely to cause unwarranted and substantial damage or unwarranted and substantial distress to you or another. You can do this by giving notice to any member of the Greyfriars Project Management Ltd team specifying why the data processing is or will be the cause of distress or damage and the purpose and manner of processing to which objection is made.

Greyfriars Project Management Ltd then has one month to respond with a written notice stating either that we have, or intend to, comply with the request or why we regard the notice as unjustified and the extent to which we have or intend to comply with it.

## **BREACH**

In the extremely unlikely event that there is a personal data breach, Greyfriars Project Management Ltd will report this to the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach. A 'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. If the breach is likely to adversely affect the individual's rights or freedoms, the individual must be informed also. Greyfriars Project Management Ltd must keep a record of any and all personal data breaches.

Examples of breaches are as follows: -

- improper disposal of equipment or documents
- lost or stolen equipment or documents (that don't have the proper protection)
- inefficient/ineffective access controls (including physical access)
- inefficient/ineffective data governance (improper filing, data out of date etc.)
- inappropriate defence against cyber threats – viruses and phishing
- unprotected transmissions (email, video conferences etc.)
- insufficient or lack of policies, procedures, controls
- equipment failure
- poorly trained, unaware, negligent or even 'malicious' employees

## **FURTHER INFORMATION**

Further information regarding your rights can be found on the ICO's website: <https://ico.org.uk/>.