



# Data Protection and Privacy Policy Statement

## **Introduction**

Our Company Data Protection and Privacy Policy is in line with the laws set out in the GDPR (General Data Protection Regulation) and covers the following areas in layman's terms:

1. What data we have and why we have it.
2. How we manage and encrypt our data.
3. Who is responsible for our data.
4. How we train our team.
5. What we will do if the worst happens.

## **1. What data we have and why we have it.**

Sword Security needs to collect and use certain information about the people we meet to carry out our work and serve our clients to the best of our ability. This personal information is collected and dealt with as set out in the GDPR. The data we collect and store is:

- First and last name so that we can address you personally in our communications and so that we can differentiate who is who using last names.
- Email address
- Physical address
- Telephone numbers

## **2. Data Controller**

Sword Security is the Data Controller under the GDPR, which means that it determines what purposes personal information held and will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

## **3. Disclosure**

Sword Security does not share data with other agencies save for when required to do so under statute; e.g. HMRC and so on.

Sword Security intends to ensure that personal information is treated lawfully and correctly.

To this end, Sword Security will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998.



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Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- b) Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
- c) Shall be adequate, relevant and not excessive in relation to those purpose(s)
- d) Shall be accurate and, where necessary, kept up to date,
- e) Shall not be kept for longer than is necessary
- f) Shall be processed in accordance with the rights of data subjects under the Act,
- g) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- h) Shall not be transferred to a country or territory outside the UK.

Sword Security will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information.
- Meet its legal obligations to specify the purposes for which information is used.
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements.
- Ensure the quality of information used.
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
  - The right to be informed that processing is being undertaken,
  - The right of access to one's personal information,
  - The right to prevent processing in certain circumstances, and
  - The right to correct, rectify, block or erase information which is regarded as wrong information.
- Take appropriate technical and organisational security measures to safeguard personal information.



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- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.
- Set out clear procedures for responding to requests for information.

## 4. Data collection

Informed consent is when:

- An Individual/Service User clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data.
- And then gives their consent.

Sword Security will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, Sword Security will ensure that the Employee/Service User/Other Individual:

- A. Clearly understands why the information is needed.
- B. Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing.
- C. As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed.
- D. Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress.
- E. Has received sufficient information on why their data is needed and how it will be used.

## 5. Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff.

Information will be stored for only as long as it is needed under the required statute and will be disposed of appropriately.



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It is Sword Security's responsibility to ensure all personal and company data is nonrecoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

## 6. Data access and accuracy

All Employee/Service Users/Other Individuals have the right to access the information Sword Security holds about them. Sword Security will also take reasonable steps to ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, Sword Security will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection.
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice.
- Everyone processing personal information is appropriately trained to do so.
- Everyone processing personal information is appropriately supervised.
- Anybody wanting to make enquiries about handling personal information knows what to do.
- It deals promptly and courteously with any enquiries about handling personal information.
- It describes clearly how it handles personal information.
- It will regularly review and audit the ways it holds, manage and use personal information.
- It regularly assesses and evaluates its methods and performance in relation to handling personal information.
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact the Sword Security Data Protection Officer:



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