

# Broxbourne Solutions Data Protection Policy

## *Scope of the policy*

The policy sets out the requirements that Broxbourne Solutions Ltd must gather information for the purposes of its business. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by Broxbourne Solutions to ensure that we are compliant. This policy should be read in conjunction with the Broxbourne Solutions Privacy Policy.

## *Why this policy exists*

This data protection policy ensures Broxbourne Solutions:

- Complies with data protection law and follows good practice
- Is open about how it stores and processes data
- Protects itself from the risks of a data breach

## *General guidelines*

- Data will not be shared outside Broxbourne Solutions unless with prior consent and/or for specific and agreed reasons.
- Information will be refreshed periodically to ensure accuracy.
- Information will be kept securely through the use of secure passwords, use of up-to-date software including all security patches, antivirus software and other security measures.

## *Data protection principles*

The General Data Protection Regulation identifies key data protection principles:

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner

Principle 2 - Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered incompatible with the initial purposes.

Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

Principle 4 – Personal data held should 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;

Principle 5 – Personal 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;

Principle 6 - Personal data must be processed in accordance with 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.

## *Lawful, fair and transparent data processing*

Broxbourne Solutions requests personal information from bookings for conferences and other events and generally from its business to business activities including sending communications about future conferences and events. The forms (both paper and digital) used to request personal information will draw user's attention to both the Conditions of Booking and Broxbourne Solutions' Privacy and Data Protection Policies. The lawful basis for obtaining information is due to the contractual relationship that Broxbourne Solutions has with businesses and individuals. Users will be informed as to who they need to contact should they wish for their data not to be used for specific purposes for which they have provided consent. Where these requests are received they will be acted upon promptly and the person will be informed as to when the action has been taken.

## *Processed for specified, explicit and legitimate purposes*

Users will be informed as to how their information will be used and Broxbourne Solutions will seek to ensure that information is not used inappropriately. Appropriate use of information provided will include:

- Communicating with about Broxbourne Solutions events and conferences
- The administration of events and conferences

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- Communicating with users about specific issues that may have arisen during the course of their contractual relationship with Broxbourne Solutions

Broxbourne Solutions will ensure that information is managed in such a way as to not infringe an individual's rights which include:

- 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

## *Adequate, relevant and limited data processing*

Individuals will only be asked to provide information that is relevant. This will include:

- your name
- your job title
- your organisation
- your organisation's address
- email address
- telephone number
- your payment preferences
- dietary requirements

## *Photographs*

Photographs are classified as personal data. Where photographs are being taken, permission will be sought in advance or, in the case of general photographs (e.g. of a conference), the delegates will be told in advance that photographs may be taken so that, should they wish, they can opt out at that point.

## *Accuracy of data and keeping data up-to-date*

Broxbourne Solutions has a responsibility to ensure personal information is kept up to date and will review the data it holds on an annual basis.

## *Accountability and governance*

The Director(s) of Broxbourne Solutions are responsible for ensuring that it remains compliant with data protection requirements and can evidence that it has. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely.

## *Secure Processing*

The Director(s) have a responsibility to ensure that data is both securely held and processed. This will include:

- the use of secure passwords,
- use of up-to-date software including all security patches,
- antivirus software and other security measures
- secure back-up of data
- secure destruction of out-of-date information

## *Subject Access Request*

You are entitled to request access to the information that is held by Broxbourne Solutions. The request needs to be received in the form of an email request to [jeff.ross@broxbourne-solutions.co.uk](mailto:jeff.ross@broxbourne-solutions.co.uk). On receipt of the request, the request will be formally acknowledged and dealt with expediently (the legislation requires that information should generally be provided within one month) unless there are exceptional circumstances as to why the request cannot be granted. Broxbourne Solutions will provide a written response detailing all information held. A record will be kept of the date of the request and the date of the response.

## *Data Breach Notification*

Were a data breach to occur action shall be taken to minimise the harm. Where necessary, the Information Commissioner's Office would be notified. The Committee shall also contact the relevant users to inform them of the data breach and actions taken to resolve the breach.