

## Data protection Policy

### Context and overview

#### Key details

- Policy prepared by: Shaun Heywood – 15/04/2018
- Approved by management on: 16/04/2018
- Policy became operational on: 16/04/2018
- Next review date: 16/04/2020

#### Introduction

Seabrokers Ltd needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how personal data is to be collected, handled and stored to meet the company's data protection standards – and to comply with the law.

#### Why this policy exists

This data protection policy ensures Seabrokers Ltd:

- Complies with data protection law and follows good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risk of a data breach

#### Data protection law

The Data Protection Act 1998 describes how organisations – including Seabrokers Ltd – must collect, handle and store personal information.

The rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up-to-date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

## People, risks and responsibilities

### Policy scope

This policy applies to:

- Seabrokers Ltd
- All staff of Seabrokers Ltd
- All contractors, suppliers and other people working on behalf of Seabrokers Ltd

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Name of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- ...plus any other information relating to individuals

### Data protection risks

This policy helps to protect Seabrokers Ltd from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

## Responsibilities

Everyone who works for or with Seabrokers Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

Everyone that handles personal data must ensure that it is handled and processed in line with this policy.

However, these people have key areas of responsibility:

- The **board of directors** is ultimately responsible for ensuring that Seabrokers Ltd meets its legal obligations.
- The **QA Manager**, is responsible for:
  - Keeping the board updated about data protection responsibilities, risks and issues.
  - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
  - Handling questions related to data protection from staff and anyone else covered by this policy.
  - Dealing with requests from individuals to see the data Seabrokers Ltd holds about them (also called 'subject access requests').
  - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- The **IT department**, is responsible for:
  - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
  - Performing regular checks and scans to ensure security hardware and software is functioning properly.
  - Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.

## General staff guidelines

- The only people able to access data covered by this policy should be those who **need it for their work**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line manager and QA Manager.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, **strong passwords must be used** and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within the company or externally.
- Data should be **regularly reviewed and updated**, if it is found to be out of date and if no longer required, it should be deleted and disposed of.
- Employees **should request help** from their line manager or QA Manager if they are unsure about any aspect of data protection.

## Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely should be directed to your line manager or the QA Manager.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Employees should make sure the paper documents are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like pen drives), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

## Data use

Personal data is of no value to Seabrokers Ltd unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be **encrypted before being transferred electronically**. The IT team can explain how to send data to authorised external contacts.
- Personal data should **never be transferred outside of the European Economic Area**.
- Employees **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.

## Data accuracy

The law requires Seabrokers Ltd to take reasonable steps to ensure data is kept accurate and up-to-date.

The more important it is that the personal data is accurate, the greater the effort Seabrokers Ltd should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up-to-date as possible.

- Data will be held in **as few places as necessary**. Staff should not create any unnecessary additional data sets.
- Staff should **take every opportunity to ensure data is updated**.
- The company will make it **easy for data subjects to update information** Seabrokers Ltd holds about them.
- Data should be **updated as inaccuracies are discovered**. For instance, if a contact can no longer be reached on their stored telephone number, it should be removed from the database.

## Subject access requests

All individuals who are the subject of personal data held by Seabrokers Ltd are entitled to:

- Ask **what information** we hold and why.
- Ask **how to gain access** to it.
  - Right to be informed
  - Right to rectification
  - Right to erasure
  - Right to restrict processing
  - Right to data portability
  - Right to object
  - Right to access
- Why was it was **originally gathered**.
- Be informed **how to keep it up-to-date**.
- How **long we will retain it**.
- Be informed how the company is **meeting its data protection obligations**.
- Do we ever **share it with third parties and on what basis that maybe**.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email. Verification of the identity of anyone making a subject access request must be carried out before handing over any information.

## Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Seabrokers Ltd will disclose requested data. However, Seabrokers Ltd will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.