

Universal Learning Ltd Data Protection Policy 2015

1. Introduction

This document sets out the obligations of Universal Learning Ltd (“the Company”) with regard to data protection and the rights of people with whom it works in respect of their personal data under the Data Protection Act 1998 (“the Act”).

We consider that the correct treatment of personal data is integral to our successful operations and to maintaining trust of the persons we deal with. We fully appreciate the underlying principles of the Act and support and adhere to its provisions.

This Policy therefore shall set out procedures which are to be followed when dealing with personal data. The procedures set out herein must be followed by the Company, its employees, contractors, agents, consultants, partners or other parties working on behalf of the Company.

The Company views the correct and lawful handling of personal data as key to its success and dealings with third parties. The Company shall ensure that it handles all personal data correctly and lawfully.

2. The Data Protection Principles

This Policy aims to ensure compliance with the Act. The Act sets out eight principles with which any party handling personal data must comply.

We will comply with the eight enforceable data protection principles by making sure that personal data is:

1. fairly and lawfully processed
2. processed for limited purposes
3. adequate, relevant and not excessive
4. accurate and kept up to date
5. not kept longer than necessary
6. processed in accordance with the individual’s rights
7. transferred using secure means, electronically or otherwise
8. not transferred to countries outside the European Economic area unless the country to which the data is to be transferred has adequate protection for the individuals

3. **Rights of Data Subjects**

Under the Act, data subjects have the following rights:

The right to be informed that their personal data is being processed;

The right to access any of their personal data held by the Company within 40 days of making a request;

The right to prevent the processing of their personal data in limited circumstances; and

The right to rectify, block, erase or destroy incorrect personal data.

4. **Personal Data**

Personal data is defined by the Act as data which relates to a living individual who can be identified from that data or from that 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.

The Act also defines “sensitive personal data” as personal data relating to the racial or ethnic origin of the data subject; their political opinions; their religious (or similar) beliefs; trade union membership; their physical or mental health condition; their sexual life; the commission or alleged commission by them of any offence; or any proceedings for any offence committed or alleged to have been committed by them, the disposal of such proceedings or the sentence of any court in such proceedings.

The Company only holds personal data which is directly relevant to its dealings with a given data subject. That data will be held and processed in accordance with the data protection principles and with this Policy. >.

5. **Processing Personal Data**

Any and all personal data collected by the Company (including that detailed in Section 4 of this Policy) is collected in order to ensure that the Company can facilitate efficient transactions with third parties including, but not limited to, its customers, partners, associates and affiliates and efficiently manage its employees, contractors, agents and consultants. Personal data shall also be used by the Company in meeting any and all relevant obligations imposed by law.

Personal data may be disclosed within the Company. Personal data may be passed from one department to another in accordance with the data protection principles and this Policy. Under no circumstances will personal data be passed to any department or any individual within the Company that does not reasonably require access to that personal data with respect to the purpose(s) for which it was collected and is being processed.

6. **Data Protection Procedures**

The Company shall ensure that all of its employees, contractors, agents, consultants, partners or other parties working on behalf of the Company comply with the following when processing and / or transmitting personal data:

All emails containing personal data must be encrypted;

Personal data may be transmitted over secure networks only – transmission over unsecured networks is not permitted in any circumstances;

Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient. Using an intermediary is not permitted;

All hardcopies of personal data should be stored securely in a locked box, drawer, cabinet or similar;

All electronic copies of personal data should be stored securely using passwords and suitable data encryption, where possible on a drive or server which cannot be accessed via the internet.

All passwords used to protect personal data should be changed regularly and should not use words or phrases which can be easily guessed or otherwise compromised.

7. Our commitment to Data Protection

We will ensure that:

- everyone managing and handling personal information understands that they are responsible for following good data protection practice
- there is someone with specific responsibility for data protection in the organisation
- staff who handle personal information are appropriately supervised and trained
- queries about handling personal information are promptly and courteously dealt with
- people know how to access their own personal information
- methods of handling personal information are regularly assessed and evaluated
- any disclosure of personal data will be in compliance with approved procedures.
- we take all necessary steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure
- all contractors who are users of personal information supplied by the company will be required to confirm that they will abide by the requirements of the Act with regard to information supplied by us.

10. Implementation of Policy

This Policy shall be deemed effective as of September 2015 . No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved & authorised by:

Name:

Paul Hawkins

Managing Director, Universal Learning Ltd

Date:

30 September 2015

Signature:

A handwritten signature in black ink, appearing to be 'Neil', followed by a period.

Policy Review Date:

29th September 2016