



## Data protection policy

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## Data protection policy

This policy is addressed to staff members, but is relevant to all aspects of data protection.

As an employee of Equityity you should be aware of the importance of complying fully with all policies of the company.

The data protection policy exists to:

- protect your data;
- protect the data of other members of our staff;
- comply with the law;
- protect the data of the company.

Protection of the data of the company is more fully covered in your personal contract of employment.

Please remember that data protection is the responsibility of all staff members at all times. It is very easy to disclose information about a colleague to a customer or friend, or about a customer to your spouse or relative. If you do so, you are in breach of this policy and of your contract of employment. To avoid this, you should avoid discussing any aspect of your work outside of work and discuss issues about which you have strong feelings only with the appropriate person at work.

We are extremely concerned to protect your privacy and confidentiality. We understand that not only all employees, but also customers, suppliers and others with whom we come into contact in our working day are quite rightly concerned to know that your or their data will not be used for any purpose unintended by them, and will not fall into the hands of a third party. Our policy is both specific and strict. If you come across any instance of a failure of our policy, do please tell us.

Information may be unlawfully available to computer hackers and unlawful visitors. We will take reasonable precautions against such events, but we take no responsibility for any unlawful act of any person.

Except as set out below, we do not share, or sell, or disclose to a third party, any personally identifiable information we collect.

## Our policy

### Security and management of personal data

#### 1 Data security

- 1.1 Rebecca Slough is the Data Controller in the Company.
- 1.2 because personal data is or may be held on many computers within the office, please use the password system laid down. Do not change any password or insert password access where previously there was none.
- 1.3 Sensitive personal data is kept on one computer in the company. That computer is kept in a room, which is locked at night. Access to the sensitive data is protected and is limited to 2 staff



members. If it is necessary to extract any such data for use by another staff member, the Data Controller will follow the use and satisfy him / herself that the data has been deleted after use.

- 1.4 The company has a backup procedure for all data. Those involved in any element of it are reminded of the crucial importance of timely compliance with the procedures.

## **2 Sensitive personal data**

The Act defines eight categories of sensitive personal data. These are:

- 2.1 the racial or ethnic origin of data subjects;
- 2.2 their political opinions;
- 2.3 their religious beliefs or other beliefs of a similar nature;
- 2.4 whether they are a member of a trade union;
- 2.5 their physical or mental health or condition;
- 2.6 their sexual life;
- 2.7 the commission or alleged commission by them of any offence;
- 2.8 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.

We do not collect sensitive personal data.

**Here is a list of the information we collect, and why it is necessary to collect it:**

## **3 Employee information**

This information is used:

- 3.1 to maintain proper employment records for our own use;
- 3.2 to maintain salary records and to pay staff in accordance with our obligations;
- 3.3 to comply with our legal obligations relating to tax and money;
- 3.4 to comply with legal obligations relating to employment.

## **4 Customer and client information**



This information is used:

- 4.1 to provide customers and clients with the services they have requested;
- 4.2 for billing and accounting purposes;
- 4.3 to enable us to answer their enquiries;
- 4.4 for verifying their identity for security purposes;
- 4.5 for marketing our services and products;
- 4.6 information which does not identify any individual may be used in a general way by us or third parties, to provide class information, for example relating to demographics or usage of a particular page or service.

## **5 Domain names and e-mail addresses**

are recognised by our servers and the pages visited are recorded. This information is used:

- 5.1 in a collective way not referable to any particular individual, for the purpose of quality control and improvement of our site;
- 5.2 to send out news about the services to which web site visitors have signed up;
- 5.3 to tell customers and clients about any other of our services.

## **6 Financial information, including credit card details**

This information is used to obtain payment for goods and services ordered from us. We do not use it for any other purpose. We do not store this information longer than is necessary to process a payment. We are not responsible for such data once it has passed to our merchant service provider /bank.

## **7 Business associates' information**

This is information given to us in the course of business. This information is used :

- 7.1 to maintain our accounts and business records;
- 7.2 to enable us to answer enquiries;
- 7.3 to verify identities;

## **8 Disclosure to Government**



and their agencies. We are subject to the law like everyone else. We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

## **9 Information request**

At any time you may review or update the personally identifiable information that we hold about you, by contacting us at the address below. To better safeguard your information, we will also take reasonable steps to verify your identity before granting access or making corrections to your information.