

Believe Energy Ltd GDPR Policy - 29 March 2020

Introduction

Believe Energy Ltd is committed to the General Data Protection Regulation (GDPR) and the protection of personal data, in line with the GDPR collection, usage, storage and security requirements.

This policy implements the requirements by all our staff to be GDPR compliant.

This policy applies to all our staff including the managing director and employees.

Believe Energy is the Controller.

Believe Energy Ltd collects and uses personal information relating to nurseries, including their managers and staff – names, telephone numbers, addresses, e mail addresses and setting's addresses.

All personal data is handled with GDPR compliance to legal requirements.

Key Definitions

It is important all Believe Energy Ltd staff understand the key definitions.

Personal Data

This is Information that relates to a **real** person.

Employee

This refers to Part/Full Time with/without contracts and temporary employees

Data Controller

This refers to the person/ joint persons/ organisation who determines the purposes and the processing of personal data.

Third Party

This refers to another organisation involved in the use/transfer of the personal data – this is not applicable to Believe Energy Ltd – We do not transfer information to a third party.

Contact

Contact is made to hospitality and educational organisations and private customers.

Identifiable Natural Person

We identify a natural person using name and location factors.

Data Subject

This is the individual to whom the personal data refers.

Consent

This is:

'Any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.' (MetaCompliance)

Data Processors

This is the person/persons, or organisation, that processes personal data on behalf of the Data Controller.

Processing

This is the collecting, recording, storing, erasure of personal data, automatically or otherwise.

Personal data is stored on hard copies in secure files and in electronic files.

Personal data no longer used for a specified purpose will be shredded.

Personal Data Breach

This is the unlawful loss, destruction, unauthorised disclosure of personal information.

How Will Our Policy Be Monitored?

All our staff who collect and process personal information will understand the requirements of the GDPR and the need for compliance.

Meetings will be held, minuted and electronically/manually filed, so the whole team has a clear understanding.

Staff must be aware of **The Six Principles**:

1. **Lawfulness, Fairness and Transparency**: Personal data will be processed **lawfully** (purposeful), **fairly** (the process should be the same as communicated to the Data Subject and **transparently** (the Data Subject knows what processing will occur).
2. **Purpose Limitation**: The purpose of dealing with data will be clearly specified and restricted to that use.
3. **Data Minimisation**: Only data required will be stored.
4. **Accuracy**: Personal data will be accurate and up to date. Procedures will be in place to identify unneeded data.
5. **Storage Limitation**: Data will only be stored for the time required for the purposes specified.
6. **Integrity and Confidentiality**: Security of the data will be maintained at all times.

Accountability

Believe Energy Ltd is responsible for the data and will be able to show compliance.

Believe Energy Ltd will show that all 6 Principles are adhered to when collecting, holding and storing data.

Data Collection: Data Sources

Believe Energy Ltd collects personal information from private customers and various organisations; managers and their staff.

Data Subject Consent

Consent will be received by customers sending us their personal information.

Data Subject Notification

Believe Energy Ltd notifies all data subjects that their personal information is being used and for what purpose.

Data Use: Data Processing

Believe Energy Ltd processes personal data for the following reasons:

Believe Energy Ltd processes data to create:

- personal user accounts
- administration accounts
- methods of communication between Believe Energy Ltd and their clients

This information is collected via telephone, e mail, social media and website.

If the personal data is sensitive then this will be identified and the data subject will consent to this data.

Data Quality

Believe Energy Ltd will ensure the quality of the personal data by keeping it accurate and up to date.

Data Retention

Believe Energy Ltd will not hold data for longer than is necessary to fulfil the purpose specified.

If hard copies are held and no longer used then they will be shredded.

Data Protection

Only those staff members authorised will access personal data.

Passwords lock the computers.

The Data Processors will work under instruction from the Data Controller.

Any data used for different reasons will be processed separately.

Data Transfers

Any data transfer must be given consent by the data subject.

Breaches

Any breaches will be reported to the Managing Director and treated seriously.

A breach may be the result of theft, equipment failure or accidental loss.

This policy is available for all staff.

There are 4 stages when considering managing a breach:

1. **Containment and Recovery:** A recovery plan would be set in motion and an aim for damage limitation.
2. **Assessing the Risks:** In response to the breach, a risk assessment would be carried out to note the risk to the person/persons or business.
3. **Notification of Breaches:** Relevant people would be notified of any breach in security.
4. **Evaluation and Response:** Any breach would be fully investigated and systems reviewed, along with the policies and procedures.