

GLOBAL FINANCIAL AND
TECHNOLOGY RECRUITMENT

GDPR COMPLIANCE DOCUMENT

INTRODUCTION

SUMMARY OF POLICY

Cooper White Group (hereafter CWG) take the privacy of our clients and candidates seriously. We are a UK-based recruitment company operating permanent and temporary recruitment, across financial services, professional services, public sector and industry & commerce. Our specialisms include: Wealth Management, Technology, and Risk & Governance.

1. HOW WE RECEIVE INFORMATION AND HOW WE MAY USE IT

CWG receives your personal data in the following ways:

- when you apply directly for an advertised role via our website
- when you apply directly to be a candidate for whom we can facilitate a job search
- via a third party when you respond to a job post placed by CWG on a job board on behalf of a third-party client.

This statement explains how we process personal data received into CWG. When you register with CWG you must consent to us collecting and storing your personal information. You will not be able to submit your enquiry or details to CWG without consenting to us storing your personal data. This may include, but is not necessarily restricted to:

- Name
- Contact Details
- Address
- Employment History
- Mobility
- Education
- Professional Qualifications

During telephone conversations and face to face interviews we may collect personal information with regard to your employment preferences and your strengths and work experience as relevant to your job search; this information may be stored on your personal record. This information is a necessary part of the process of supporting your job search, as well providing a basis for recommendation when CWG is short-listing candidates for a specific role.

By explicitly providing consent when you register with CWG, you are providing permission for our storage of this information. CWG will never share personal information or a Curriculum Vitae with a third party without your explicit consent.

Due to the nature of recruitment, a significant number of candidates reconnect with our organisation periodically. It is not uncommon for this to occur in the years after we have successfully placed them into a role or spoken to them about their job search. For this reason, your consent includes explicit consent to retain your personal details until such time as you wish us to delete your records from our database or refrain from further engagement.

If you have registered your details on a job board, and your CV is available for us to access, we may contact you if we believe your skills are relevant to the roles we either commonly recruit or are currently recruiting. We will inform you of where we have received your data, within 30 days.

We use professional networking sites, including but not limited to LinkedIn. From time to time, we may obtain data you have made publicly available (including but not limited to: email addresses; phone number(s); and place of work), to contact you about relevant roles. Again, we will contact you to inform you where we have obtained your data from.

If your name is given to us through a referral process, we will inform you of this, but may not be able to give the name of the person that has recommended you if they ask to remain anonymous. We will contact you within 30 days to notify you of any recommendations of your candidacy.

If you do not consent to CWG storing your personal data or setting up a personal registration for you, please do not submit your Curriculum Vitae for any roles advertised on our website. We are unable to process your application without receipt of consent to process and store your personal information.

2. JOB ALERTS AND CAREER ADVICE

We may on occasion contact candidates stored in our database who are not actively looking for a new role. When you contact CWG, you may be asked to tick a box indicating that you consent to us storing the personal data you have provided. By providing consent to our storage of your personal data you are also providing consent to us contacting you if we receive details of a role which specifically matches your career aspirations and – very occasionally – sending you career related information, including but not limited to and salary surveys and interview advice.

If you do not wish to receive such information, please email gdpr@cooperwhitegroup.com

3. OUR PROMISE TO OUR CANDIDATES

We will never share our candidates' personal details or Curriculum Vitae with a third party without the candidate's explicit consent and we will only share the personal information with that one company or individual.

4. CONTACTING CWG STAFF DIRECTLY

If you contact one of our staff directly and request they consult with you regarding your job search, or regarding a particular job role, you are giving your consent to CWG processing your email and the data contained within your email for lawful purposes, as per Clauses 1 and 2 above.

By sending an updated Curriculum Vitae directly to one of our employees you are giving consent to CWG processing and storing that information, as per Clauses 1

and 2 above. As referred to in Clause 3 of our privacy notice, we will not share your information with any third party without your explicit consent.

5. REQUEST TO HAVE PERSONAL DATA AMENDED

It is likely that over time your employment history will require updating as you transition to new roles or receive promotion. CWG undertake to update your registration within two weeks of receiving an updated Curriculum Vitae. Under the GDPR you have the right to ask for access to your personal information. Once CWG have verified your identity we will provide the information you requested within 30 days.

In the unlikely event you find personal data stored about you by CWG is inaccurate, you must advise us immediately. We will amend your personal registration within two weeks.

6. REQUEST TO HAVE PERSONAL DATA REMOVED OR DELETED

Upon receipt of a request to delete an individual's personal registration, CWG will ensure that your personal record is deleted within 30 days.

Where CWG have placed a candidate in a role, they are required to retain evidence of that placing so that contractual obligations can be met by the client. CWG will however take steps to ensure only minimal personal data is retained and we will not make further contact with the candidate.

Where CWG have previously received permission to share personal information with a third party, for example for short listing for a role, we undertake to advise that third party of your wish to be forgotten if the substantive bulk of the communication has been in the last 12 months.

In the event that you wish to be erased from our Recruitment Database you should contact gdpr@coperwhitegroup.com. It is essential you stipulate clearer whether you wish to be erased, rather than simply marked as not currently seeking employment.

7. NOTIFICATION OF BREACHES

At CWG, we sometimes store highly personal information contained within your Curriculum Vitae, and about your job search. We are aware of our responsibility as a recruiter to protect your information and to only share details with third parties upon receipt of your explicit consent. All of our systems are protected and only CWG staff have access to the personal information stored in your registration.

In the very unlikely event that our computer systems are compromised and there is a potential loss of confidentiality we will report this breach to you.

In the very unlikely event that personal data is taken or exposed from CWG records without our consent, we will provide reports surrounding that exposure within 72 hours of being notified of such an event and take any action necessary to restore security of your personal data.

8. DATA PROCESSOR

We store our data on a cloud-based CRM system (Bullhorn), please see their commitment to GDPR here:

<https://www.bullhorn.com/eu/gdpr-commitment-statement/>

9. ACCESS

If CWG receive a request for access to personal information we will verify your identity before releasing your personal data to you. We will not release information to any third party.

If you would like to make a request for access to your personal information please contact:

gdpr@cooperwhitegroup.com

Alternatively you can contact us by writing to us at:

GDPR Compliance Officer
Cooper White Group
19 Willow Street
London
EC2A 4BH

10. COMPLAINTS PROCEDURE

If you have a complaint about the way your data is stored or handled by CWG, please contact us at: gdpr@cooperwhitegroup.com

Alternatively, you can contact us by writing to us at:

GDPR Compliance Officer
Cooper White Group
19 Willow Street
London
EC2A 4BH

11. ESCALATED COMPLAINTS

If you remain unhappy with the handling of your data you can complain to the Information Commissioner's Office in writing to:

ICO
Wycliffe House Water Lane Wilmslow Cheshire
SK9 5AF

12. CHANGES TO OUR PRIVACY POLICY

This privacy policy may be changed by CWG at any time. Any changes to our Privacy Policy will be updated on our website. If you have any questions or concerns, please email us at gdpr@cooperwhitegroup.com

FULL POLICY

1. INTRODUCTION

- This Policy sets out the obligations of Cooper White Group, a company registered in England under number 7713564 whose registered office is at 19 Willow Street, London, EC2A 4BH (“the Company”) regarding data protection and the rights of candidates, clients & all internal & external stakeholders (“data subjects”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).
- The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- This Policy sets the Company’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.
- The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2. THE DATA PROTECTION PRINCIPLES

- This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:
 - Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
 - 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 to be incompatible with the initial purposes.
 - Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
 - Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.

- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is 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 the data subject.
- Processed in 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.

3. THE RIGHTS OF DATA SUBJECTS

- The GDPR sets out the following rights applicable to data subjects (please refer to the parts of this policy indicated for further details):
 - The right to be informed (Part 12).
 - The right of access (Part 13);
 - The right to rectification (Part 14)
 - The right to erasure (also known as the ‘right to be forgotten’) (Part 15);
 - The right to restrict processing (Part 16);
 - The right to data portability (Part 17);
 - The right to object (Part 18); and
 - Rights with respect to automated decision-making and profiling (Parts 19 and 20).

4. LAWFUL, FAIR, AND TRANSPARENT DATA PROCESSING

- The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:
 - The data subject has given consent to the processing of their personal data for one or more specific purposes;
 - The processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract with them;
 - The processing is necessary for compliance with a legal obligation to which the data controller is subject;
 - The processing is necessary to protect the vital interests of the data subject or of another natural person;
 - The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or

- The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
- [If the personal data in question is “special category data” (also known as “sensitive personal data”) (for example, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), at least one of the following conditions must be met:
 - The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so);
 - The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law (insofar as it is authorised by EU or EU Member State law or a collective agreement pursuant to EU Member State law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);
 - The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
 - The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;
 - The processing relates to personal data which is clearly made public by the data subject;
 - The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;
 - The processing is necessary for substantial public interest reasons, on the basis of EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;
 - The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;
 - The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or

ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of EU or EU Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or

- The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.]

5. SPECIFIED, EXPLICIT, AND LEGITIMATE PURPOSES

- The Company collects and processes the personal data set out in Part 21 of this Policy. This includes:
 - Personal data collected directly from data subjects[.] OR [; and]
 - [Personal data obtained from third parties.]
 - The Company only collects, processes, and holds personal data for the specific purposes set out in Part
 - 21 of this Policy (or for other purposes expressly permitted by the GDPR).
 - Data subjects are kept informed at all times of the purpose or purposes for which the Company uses their personal data. Please refer to Part 12 for more information on keeping data subjects informed.

6. ADEQUATE, RELEVANT, AND LIMITED DATA PROCESSING

- The Company will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed) as under Part 5, above, and as set out in Part 21, below.

7. ACCURACY OF DATA AND KEEPING DATA UP-TO-DATE

- The Company shall ensure that all personal data collected, processed, and held by it is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 14, below.
- The accuracy of personal data shall be checked when it is collected and at [regular] intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

8. DATA RETENTION

- The Company shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.
- When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.
- For full details of the Company’s approach to data retention, including retention periods for specific personal data types held by the Company.

9. SECURE PROCESSING

- The Company shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in Parts 22 to 27 of this Policy.

10. ACCOUNTABILITY AND RECORD-KEEPING

- The Company’s Data Protection Officer is Tom Smith (+44 207 6536 723)
- The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company’s other data protection-related policies, and with the GDPR and other applicable data protection legislation.
- The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
 - The name and details of the Company, its Data Protection Officer, and any applicable third-party data processors;
 - The purposes for which the Company collects, holds, and processes personal data;
 - Details of the categories of personal data collected, held, and processed by the Company, and the categories of data subject to which that personal data relates;
 - Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
 - Details of how long personal data will be retained by the Company
 - Detailed descriptions of all technical and organisational measures taken by the Company to ensure the security of personal data

11. DATA PROTECTION IMPACT ASSESSMENTS

- The Company shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data [which involve the use of new technologies and the processing involved is likely to result in a high risk to the rights and freedoms of data subjects under the GDPR].

- Data Protection Impact Assessments shall be overseen by the Data Protection Officer and shall address the following:
 - The type(s) of personal data that will be collected, held, and processed;
 - The purpose(s) for which personal data is to be used;
 - The Company’s objectives;
 - How personal data is to be used;
 - The parties (internal and/or external) who are to be consulted;
 - The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
 - Risks posed to data subjects;
 - Risks posed both within and to the Company; and
 - Proposed measures to minimise and handle identified risks.

12. KEEPING DATA SUBJECTS INFORMED

- The Company shall provide the information set out in Part 12.2 to every data subject:

12.1.1 Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and

12.1.2 Where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:

a) if the personal data is used to communicate with the data subject, when the first communication is made;

or

b) if the personal data is to be transferred to another party, before that transfer is made; or

c) as soon as reasonably possible and in any event not more than 30 days after the personal data is obtained.

12.2 The following information shall be provided:

12.2.1 Details of the Company including, but not limited to, the identity of its Data Protection Officer;

12.2.2 The purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 21 of this Policy) and the legal basis justifying that collection and processing;

12.2.3 Where applicable, the legitimate interests upon which the Company is justifying its collection and processing of the personal data;

- 12.2.4 Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
- 12.2.5 Where the personal data is to be transferred to one or more third parties, details of those parties;
- 12.2.6 Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the “EEA”), details of that transfer, including but not limited to the safeguards in place (see Part 28 of this Policy for further details);
- 12.2.7 Details of data retention;
- 12.2.8 Details of the data subject’s rights under the GDPR;
- 12.2.9 Details of the data subject’s right to withdraw their consent to the Company’s processing of their personal data at any time;
- 12.2.10 Details of the data subject’s right to complain to the Information Commissioner’s Office (the “supervisory authority” under the GDPR);
- 12.2.11 Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it; and
- 12.2.12 Details of any automated decision-making or profiling that will take place using the personal data, including information on how decisions will be made, the significance of those decisions, and any consequences.

13. DATA SUBJECT ACCESS

- 13.1 Data subjects may make subject access requests (“SARs”) at any time to find out more about the personal data which the Company holds about them, what it is doing with that personal data, and why.
- 13.2 Data subjects wishing to make a SAR may do so in writing, using the Company’s Subject Access Request Form, or other written communication. SARs should be addressed to the Company’s Data Protection Officer at gdpr@cooperwhitegroup.com
- 13.3 Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.

- 13.4 All SARs received shall be handled by the Company's Data Protection Officer.
- 13.5 The Company does not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

14. RECTIFICATION OF PERSONAL DATA

- 14.1 Data subjects have the right to require the Company to rectify any of their personal data that is inaccurate or incomplete.
- 14.2 The Company shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Company of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.
- 14.3 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

15. ERASURE OF PERSONAL DATA

- 15.1 Data subjects have the right to request that the Company erases the personal data it holds about them in the following circumstances:
- 15.1.1 It is no longer necessary for the Company to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;
- 15.1.2 The data subject wishes to withdraw their consent to the Company holding and processing their personal data;
- 15.1.3 The data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so) (see Part 18 of this Policy for further details concerning the right to object);
- 15.1.4 The personal data has been processed unlawfully;
- 15.1.5 The personal data needs to be erased in order for the Company to comply

with a particular legal obligation[;] OR [.]

- 15.1.6 [The personal data is being held and processed for the purpose of providing information society services to a child.]
- 15.2 Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.
- 15.3 In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

16. RESTRICTION OF PERSONAL DATA PROCESSING

- 16.1 Data subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.
- 16.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

17. DATA PORTABILITY

- 17.1 The Company processes personal data using automated means on Bullhorn
- 17.2 Where data subjects have given their consent to the Company to process their personal data in such a manner, or the processing is otherwise required for the performance of a contract between the Company and the data subject, data subjects have the right, under the GDPR, to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers).
- 17.3 To facilitate the right of data portability, the Company shall make available all applicable personal data to data subjects in the following

format[s]:

- 17.3.1 Hard copy documents;
- 17.3.2 Electronic files.
- 17.4 Where technically feasible, if requested by a data subject, personal data shall be sent directly to the required data controller.
- 17.5 All requests for copies of personal data shall be complied with within one month of the data subject's request. The period can be extended by up to two months in the case of complex or numerous requests. If such additional time is required, the data subject shall be informed.]

18. OBJECTIONS TO PERSONAL DATA PROCESSING

- 18.1 Data subjects have the right to object to the Company processing their personal data based on legitimate interests, direct marketing (including profiling), [and processing for scientific and/or historical research and statistics purposes].
- 18.2 Where a data subject objects to the Company processing their personal data based on its legitimate interests, the Company shall cease such processing immediately, unless it can be demonstrated that the Company's legitimate grounds for such processing override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.
- 18.3 Where a data subject objects to the Company processing their personal data for direct marketing purposes, the Company shall cease such processing immediately.
- 18.4 [Where a data subject objects to the Company processing their personal data for scientific and/or historical research and statistics purposes, the data subject must, under the GDPR, "demonstrate grounds relating to his or her particular situation". The Company is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.]

19. PERSONAL DATA COLLECTED, HELD, AND

PROCESSED

The following personal data could be collected, held, and processed by the Company (for details of data retention, please refer to the Company's Data Retention Policy):

Data Ref.	Type of Data	Purpose of Data
Interviews	Notes, handwritten & electronic, emails	Tracking of candidate processes
Passports	Passport scans or Photos	Compliance with UK working requirements
Personal Details	Phone numbers, email, & other contact details, address details, other personal info.	To ensure all candidates can be contacted & updated on recruitment processes they are currently opted into.
Candidate CV'S	Work history & experience	To ensure we provide the right service to our clients & understand candidate backgrounds & experience
Client Details	Handwritten or hard copies of Job specifications	To understand the need of our client & find the right candidates for the role
Bullhorn	All candidate data including but not exclusive to salary expectations, current salary, notice	To ensure we understand our candidates and can
Data Ref.	Type of Data	Purpose of Data
Database	periods, work history & career paths.	place them effectively.

20. DATA SECURITY - TRANSFERRING PERSONAL

DATA AND COMMUNICATIONS

The Company shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

- 20.1 All emails containing personal data must be marked “confidential”;
- 20.2 Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;

21 DATA SECURITY - STORAGE

The Company shall ensure that the following measures are taken with respect to the storage of personal data:

- 21.1 All electronic copies of personal data should be stored securely using passwords and data encryption;
- 21.2 All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar.
- 21.3 All personal data stored electronically should be backed up weekly with backups stored offsite.
- 21.4 No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise [without the formal written approval of Tom Smith – Director or Paul McMahon - Director and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary]; and
- 21.5 No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken).

22. DATA SECURITY - DISPOSAL

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of.

23. DATA SECURITY - USE OF PERSONAL DATA

The Company shall ensure that the following measures are taken with respect to the use of personal data:

- 23.1 No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested.
- 23.2 No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of the Data Protection Officer. Tom Smith – tom@cooperwhitegroup.com
- 23.3 Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors, or other parties at any time;
- 23.4 If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it; and
- 23.5 Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of Data Protection Officer (Tom Smith – tom@cooperwhitegroup.com) to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

24 DATA SECURITY - IT SECURITY

The Company shall ensure that the following measures are taken with respect to IT and information security:

- 24.1 All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols. [All software used by the Company is designed to require such passwords.];

- 24.2 Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- 24.3 All software (including, but not limited to, applications and operating systems) shall be kept up-to-date. The Company's Directors shall be responsible for installing any and all security-related updates [not more than 30 days after the updates are made available by the publisher or manufacturer] OR [as soon as reasonably and practically possible] [, unless there are valid technical reasons not to do so]; and
- 24.4 No software may be installed on any Company-owned computer or device without the prior approval of the Directors.

25. ORGANISATIONAL MEASURES

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- 25.1 All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the GDPR and under this Policy, and shall be provided with a copy of this Policy;
- 25.2 Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;
- 25.3 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- 25.4 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised;
- 25.5 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;

- 25.6 Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
- 25.7 All personal data held by the Company shall be reviewed periodically, as set out in the Company's Data Retention Policy;
- 25.8 The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- 25.9 All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the GDPR and this Policy by contract;
- 25.10 All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the GDPR; and
- 25.11 Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

26. TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA

- 26.1 The Company may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.
- 26.2 The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:
 - 26.2.1 The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;
 - 26.2.2 The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance

with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the GDPR); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;

- 26.2.3 The transfer is made with the informed consent of the relevant data subject(s);
- 26.2.4 The transfer is necessary for the performance of a contract between the data subject and the Company (or for pre-contractual steps taken at the request of the data subject);
- 26.2.5 The transfer is necessary for important public interest reasons;
- 26.2.6 The transfer is necessary for the conduct of legal claims;
- 26.2.7 The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or
- 26.2.8 The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

27 DATA BREACH NOTIFICATION

- 27.1 All personal data breaches must be reported immediately to the Company's Data Protection Officer.
- 27.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- 27.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 29.2) to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and

without undue delay.

- 27.4 Data breach notifications shall include the following information:
 - 27.4.1 The categories and approximate number of data subjects concerned;
 - 27.4.2 The categories and approximate number of personal data records concerned;
 - 27.4.3 The name and contact details of the Company's data protection officer (or other contact point where more information can be obtained);
 - 27.4.4 The likely consequences of the breach;
 - 27.4.5 Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

8. IMPLEMENTATION OF POLICY

This Policy shall be deemed effective as of 25 May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

CONTACT

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