

# GDPR Policy

## 1. Introduction

Performance Equations Ltd is committed to remain compliant with current General Data Protection Regulation (GDPR) regulations. As such, our commitment is laid out in this policy statement.

### 1.1 Purpose and Objectives of this policy

This policy sets out Performance Equations' commitment to comply with the General Data Protection Regulation ('the GDPR').

### 1.2 Scope and Status of the Policy

This policy applies to all Performance Equations employees, associates, contractors, partners and 3<sup>rd</sup> Party suppliers who use or process any personal data.

This policy applies regardless of where data is held, or the equipment used, if the processing is for Performance Equations' or their client's purposes. Furthermore, the policy applies to all data held in any form whether manual paper records or electronic records.

## 2. Roles and Responsibilities

### 2.1 Directors

The Directors are ultimately responsible for ensuring Performance Equations meets its legal obligations and is responsible for strategic level implementation of the policy, oversight of compliance with the policy and identifying risks.

The Directors are also primarily responsible for ensuring all systems, services and equipment used for storing data meet acceptable security standards, for performing regular checks and scans to ensure security hardware and software is functioning properly and evaluating any third-party services the company is considering using to store or process data, for instance, cloud services.

### 2.2 All employees

All employees, including permanent employees, fixed term contractors and temporary workers, must comply with this Policy and the GDPR whenever processing personal data

held by Performance Equations or on behalf of performance Equations.

### **2.3 Contractors, Associates, Suppliers, Partners, and Consultants**

Third parties (such as contractors, associates, suppliers, partners, and consultants) undertaking work on behalf of Performance Equations involving personal data must adhere to Performance Equations' Data Protection Policy and comply with the GDPR. Provision will be made in contracts with external providers to ensure compliance with this Policy and the GDPR.

### **2.4 Data Protection Officer**

Performance Equations does not have a requirement to appoint a dedicated DPO; elements of this role are covered by the Directors.

## **3. Compliance with the GDPR**

### **3.1 Awareness & Capability**

Performance Equations will implement and monitor annual completion of Data Protection training for employees. The content of that training will be reviewed annually. All new employees to the business will complete data protection training within their first month of employment.

### **3.2 Security**

Performance Equations will protect the security of personal data by maintaining and monitoring compliance to the High Level Information Security Policy.

### **3.3 Record Keeping & Retention**

Performance Equations will maintain documentation which details personal data flows within the business and the applicable retention periods for that personal data.

### **3.4 External Contractors and Third Party Access**

Performance Equations will enter into legally binding contracts with external bodies engaged to process personal data on our behalf to ensure compliance with this Policy and the GDPR.

Performance Equations will only disclose personal data to third parties such as the police and central government where there is a lawful basis for doing so and appropriate arrangements are in place with those parties.

## **4. Data Subjects Rights**

Performance Equations will comply with requests from an individual to exercise their rights under the GDPR. All individuals have the right to be informed of information Performance Equations holds about them and to request copies of that information. This is known as a Subject Access Request.

Any individual wishing to submit a Subject Access Request should contact us at the following address: [info@performance-equations.co.uk](mailto:info@performance-equations.co.uk)

Under the GDPR, individuals also have the following rights in relation to their personal data:

- The right to request their personal data is rectified if inaccurate
- The right to request erasure of their personal data
- The right to request that the processing of their personal data is restricted
- The right of portability in relation to their personal data
- The right to object to the processing of their personal data
- The right to object to processing which involves automated decision making or profiling.

Individuals who wish to exercise the above rights should contact us at the following address: [info@performance-equations.co.uk](mailto:info@performance-equations.co.uk)

Individuals should submit their request in writing and specify exactly what personal data and/or processing they are referring to and which right they wish to exercise.

All employees, contractors, customers and clients, associates, 3rd Party suppliers, partners, professional advisers and consultants are responsible for cooperating with the Directors to ensure that Performance Equations can comply with an individual's request under the GDPR within the statutory timescales.

## 5. Own Personal Data

All employees, contractors, customers and clients, associates, 3rd Party suppliers, partners, professional advisers and consultants are responsible for checking that information they provide to Performance Equations in connection with their employment or professional relationship with Performance Equations are accurate and up to date. Any changes to personal data provided (e.g. change of address) must be promptly notified, in writing, to Performance Equations. Performance Equations cannot be held responsible for errors unless the individual has properly informed Performance Equations about them.

## 6. Personal Data Breaches

Performance Equations will respond promptly to any identified personal data breaches and thoroughly investigate those incidents to ascertain whether it is necessary to amend processes or introduce new measures to mitigate against any further breaches.

Any employee, contractors, customers and clients, associates, 3rd Party suppliers, partners, professional advisers and consultants who knows or suspects an actual or potential personal data breach has occurred must immediately notify the Directors at the following address:

[info@performance-equations.co.uk](mailto:info@performance-equations.co.uk)

## 7. Compliance

Compliance with this Policy and the GDPR is the responsibility of all employees, contractors, customers and clients, associates, 3rd Party suppliers, partners, professional advisers and consultants.

All of these parties must comply with the rules and procedures made by Performance Equations. Any breach of the policy by one of these parties may result in disciplinary action or access to Performance Equations' premises, facilities and systems being withdrawn.

Any individual who considers that the Policy has not been followed in respect of personal data about themselves should also raise the matter with the Directors at the following address:

[info@performance-equations.co.uk](mailto:info@performance-equations.co.uk)