

Data Protection Policy

P2P Global Network
Data Protection Policy

Policy Governance	
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Contents

1. Introduction	4
2. Objective	5
3. Scope	6
4. What is personal data?	6
5. Our Policy	7
6. Transparent	7
7. Accountability and Governance	8
8. Data Processing Activities	8
9. Individual Rights	13
10. Data Protection Officer	14
11. Breach Notification	15
12. Privacy by Design	16
13. Data Security	17
Appendices	18
Appendix A) Reference documents	18
Appendix B) Right of access	18
Appendix C) Right to rectification	18
Appendix D) Right to erasure	18
Appendix E) Right to restriction of processing	18
Appendix F) Right to object	18
Appendix G) Automated individual decision-making, including profiling	18

1. Introduction

P2P Global Network, as a company which is authorized to conduct business. We are required to establish and maintain appropriate systems and controls for managing operational risks which can arise from inadequacies or failures in our process and systems.

Appropriate and effective data management controls are recognized as integral to our business, as a failure to meet our data privacy and protection obligations could mean potential customer or indeed employee detriment; significant operational loss; loss of reputation; loss of customers and loss of income which also, could lead to regulatory censure.

We maintain physical, electronic, and procedural safeguards to protect client and employee personal and non-personal data. We have strict internal policies against unauthorized use or disclosure of data. Client and employee data is accessible only to employees or other personnel who need it to undertake the specific tasks assigned to them. Staff members are reminded on a regular basis of their obligations about the confidentiality of client and employee information through employee training and operating procedures. Data must only be given to those who have a verified right to that information.

This policy has been drafted in line with the applicable law and control requirements and data protection laws within the USA, UK and European Union, which have been refreshed. This includes:

- The EU's General Data Protection Regulation (GDPR/'the Regulation');
- The UK's updated Data Protection Act 2018, which is the UK's enactment of GDPR;
- Wider EU legislation such as the Privacy and Electronic Communications Regulations (PECR) and future updates.
- The Digital Millennium Copyright Act (the DMCA)
- The California Consumer Privacy Act (the CCPA) and Children's Online Privacy Protection Act (COPPA)

The GDPR unifies data protection requirements across the EU member states and updates national regulations. It also introduces significant monetary fines and sanctions where organizations, including public services are found to be non-compliant. Fines of up to 4% of global turnover are possible where an organization is found to be negligent when processing personal data including adhering to the principles for processing, having, or failing to implement or adhere to appropriate data subject rights. A fine of up to 2% is possible where an organization fails to meet wider requirements under the regulations including but not limited to failing to report a data breach when required to do so.

Some activities or requests that may be considered as being administrative and unimportant to employees unaware of the consequences of not dealing with them appropriately, such as responding to requests from individuals for details on information relating to them which may have a significant monetary impact if not responded to correctly and within mandated timeframes.

GDPR applies to the processing of information relating to individuals which is carried out by organizations operating within the European Economic Area (EEA). It also applies to organizations outside the EEA which offer goods or services to individual's location within

the EEA. Additional conditions are present when granting access to data to individuals based outside of or copying data to locations outside the (EEA).

In implementing this policy, it is necessary to determine where employees are based, from where data is accessed and by whom, and where data is stored and/or transferred to.

2. Objective

The purpose of this policy is to set out how we, P2P Global Network (“The Firm”/“we”/“Company”) achieve compliance with statutory requirements when processing (i.e. collecting, using, sharing, storing and safeguarding) information that can be used to identify a living individual.

This includes but is not limited to ensuring that we meet the GDPR’s overarching principles for the processing of data which set out that personal data shall be:

- 1) Processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
- 2) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- 3) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimization’);
- 4) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);
- 5) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (‘storage limitation’);
- 6) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (‘integrity and confidentiality’).

Ultimately, we, as the data controller, shall be responsible for, and be able to demonstrate compliance with the above principles.

This policy identifies specific data processing requirements that must be met when processing information that which, whether or not intentionally disclosed, may cause physical or mental harm, embarrassment, reputational damage and/or financial loss to those individuals to whom the information relates.

The policy is supported by a number of company-wide procedures and documents which include:

- [Data processing model - The location of data including places of work, calls centers and IT support staff (including those IT staff who provide application development and maintenance); locations where personal data is stored e.g. data centers; locations where the is accessed.
- Data mapping [register/flowchart] – How data is collected, the purpose for which it is collected, its use, data users, with whom it is shared and for how long it needs to be retained.

- Data processing activities - Information captured should include a descriptor of the activity e.g. payroll, employees' administration, processing of , marketing, automated decision making;
- Record of third-party processors and outsourcers
- Record of overseas data transfers and offshore processing
- Approach to marketing – including legal basis relied upon for marketing and whether data is transferred to third parties
- Approach to profiling
- Approach to automated decision making
- Legitimate interest impact assessments
- Privacy impact assessments
- Register of requests in relation to Data Subject Rights including requests for access, erasure, rectification, objection and portability
- Register of data breach and issues
- Register of Data Privacy and Legitimate Interest Impact Assessment
- Privacy Notice and fair collection/just in time notices

The policy is also designed to work in conjunction with the following frameworks:

- Information Security
- Breach and Issue management
- Risk Management

This policy has been adopted by the firm's Board and Senior Management Team and is owned by Keeley C. Wilkinson our Data Privacy Representative.

3. Scope

This policy applies across all work place locations and to all employees, including temporary and contract workers who may have access to Company data.

4. What is personal data?

This policy is centered on the Processing of information that may identify an individual, either singularly or in an aggregated form. Under data protection legislation, this is commonly referred to as being personal data.

Personal data means any information relating to an identified or identifiable natural person (commonly referred to as 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.

In a work context, additional examples of personal data may include records referring to an employee's performance, staff absence, notes on conduct and disciplinary matters.

Personal data may also contain data that is referred to as Special Category Data. Historically this information was referred to as being sensitive personal data. Special Category Data may include data relating to an individual's:

- Sexual orientation
- Sex life
- Trade union membership
- Political or religious views
- Health data

- Genetic and biometric data, where processed to uniquely identify an individual.

Personal data relating to criminal convictions and offences are not considered as being Special Category Data; however, additional conditions apply to its processing.

5. Our Policy

The aim of this policy is:

- 1) Ensuring the firm is **Transparent** when processing personal data;
- 2) Holding individuals **Accountable** to ensure the firm is compliant with GDPR requirements;
- 3) Managing data privacy risks through a **Governance** model;
- 4) Ensuring **Data Processing Activities** are documented and assessed for legitimacy;
- 5) Developing effective processes to ensure the firm responds to **Access Rights** requests within mandated timeframes;
- 6) Identifying and keeping under review, whether it is necessary to appoint a **Data Protection Officer** and where not formally required, assigning responsibility for data protection/privacy to a senior manager;
- 7) Ensuring the firm can fulfil data **Breach Notification** requirements within the mandated time frame;
- 8) Identifying risks to data subjects within proposed data processing activities by setting out **Privacy by Design** requirements; and
- 9) Identifying **Data Security** requirements for safeguarding personal data.

6. Transparent

It is a key requirement that our firm is completely open with our employees and customers about how we collect, generate and use personal data. This is achieved through the following measures:

We communicate our data processing activities to clients, employees, and organizations we share personal data with through the use of:

- Privacy notices
- Terms of business agreements
- Fair collection notices
- Contractual agreements
- Application forms

We shall clearly state:

- The firm's name, including company registration details
- How the data will be collected
- The purpose for collecting the data
- The category of data
- How the data will be used
- Who the data will be shared with, including current and potential sub-processors of personal data, which we have or may appoint
- Details of any transfers outside the EEA
- Data subject rights

- The use of the data for marketing purposes
- The profiling of data subject using automated means, including any profiling for anti-money laundering purposes, fraud etc.
- For how long the data will be retained for
- Internal contact details for data protection queries and/or access right requests
- Regulator contact details for complaint purposes

7. Accountability and Governance

Key requirements are:

- ensuring the privacy risk is managed in a consistent manner that reflects the importance to data subjects and our firm;
- ensuring someone is ultimately accountable within our firm for ensuring both compliance with data privacy legislation and that privacy issues have an appropriate level of visibility within the organization. This is achieved through the following measures:

We have appointed a suitably authorized senior individual who is held accountable for ensuring we are compliant with GDPR requirements – this person will be the Data Privacy representative for the firm Keeley C. Wilkinson.

Compliance with this policy is assessed on a periodic basis which is currently every six months at the senior management/board meetings. Management Information (MI) assessing compliance is discussed at senior management level, with outcomes documented and tracked.

Operational risk issues are managed within the existing risk management framework, detailing the risk issue, an assessment on its potential impact to A) data subjects B) the firm, inherent and residual risk, risk action (accepted / to be mitigated / to be reassessed), risk owner, agreed action, action owner, remediation/review date.

8. Data Processing Activities

We are required to demonstrate we fully understand our lawful basis for collecting and processing personal data, as well as knowing where personal data is located and accessed from, the purpose for collecting the data, who is using the data, for how long it is necessary to retain the data and communicating our data processing activities to data subjects.

The lawful bases for processing data are:

- 1) Consent: the individual has given clear consent to process their personal data for a specific purpose.
- 2) Contract: the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.
- 3) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).
- 4) Vital interests: the processing is necessary to protect someone's life.
- 5) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

- 6) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Our controls in relation to data processing activities are achieved through the following measures:

We have established and documented the territorial scope (the data processing model) of our data processing activities. Details captured include:

- The location of places of work, calls centers including those IT support staff, who provide application development and maintenance;
- Locations where the personal data is stored e.g. data centers;
- Locations where the data is accessed from.

We have determined our lawful bases for processing personal data and have undertaken a data mapping activity that establishes how we collect data via a web-based contact form, the purpose for collecting the data we use, data users, who it's shared with and for how long it needs to be retained.

Data captured is categorized according to its sensitivity e.g. personal data, special category data, criminal conviction data and categorized according to the legal basis relied upon for collecting the data e.g. the performance of a contract, legitimate interest, consent etc.

Our data mapping is reviewed on an annual basis with the review documented.

We have established that we collect and process data for one or more of the following lawful bases:

- 1) To fulfil our contract with both our customers and employees: We need to use personal data as is necessary to provide our customers with the service and products we have agreed to provide in line with our overall service contract as well as employment contracts.
- 2) We have a legitimate interest in doing so: Taking into account customer interests, we process data to analyze customer behavior in order to improve our services, offerings and pricing; to track commission or remuneration that may be due to us; to provide for business continuity in the event of interruption or cessation; to provide you with information about our products and services; and to the extent required for the administration of our insurance/financial services, to ensure we have appropriate records.
- 3) We are required to do so by law or regulation: We may be required by the regulatory authorities to process and store some data in order to fulfil our legal or regulatory obligations. We may capture and share personal data with organizations who can confirm our customers/employees' identity and provide information necessary to prevent fraud or other crimes. We may also be required to share personal data where requested to by legal authorities.
- 4) There is a substantial public interest in doing so: Advising, arranging, underwriting or administering an insurance contracts or claims involves the processing of personal data, including 'special category' information about health

or criminal convictions. Under UK data protection law such processing is regarded as having a substantial public interest in the efficient functioning of insurance markets.

- 5) We have been provided with consent: Where customers have provided their informed consent, we will process personal data in accordance with the permission they have given us and we will process any withdrawal of consent
- 6) We have been provided with explicit consent: Where customers provide their explicit consent, we will process their special categories of data and criminal convictions data in accordance with the permission they have given us and will process any withdrawal of consent.

Where we have collected data through consent, we will:

- Record the collection method
- Record what the data subject has consented to
- Record their individual's name and the date consent was granted
- Record the category of personal data i.e. personal data, special categories of data, data relating to criminal records and/or offences, being processed
- Record whether the consenting individual is a parent or guardian that is providing consent for another
- Provide a method for allowing individuals to withdraw their consent
- For explicit consent we will ensure that the customer has physically written/typed a consenting phrase, such as "I consent to this processing".

Where a requirement exists to transfer or grant access to special categories of personal data, explicit consent to do so must be gained from the data subject prior to the transfer or accessing of the data.

This also documents our data processing activities, commonly referred to as a record of processing. Information captured includes a descriptor of the activity e.g. payroll, the administering of employees, the processing of [claims / quoting / to place business / all of these / etc.], marketing, automated decision making.

Where we use personal data for marketing purposes, we will document:

- The purpose of the marketing activity
- The legal basis we use to process the personal data
- Where we receive the data from third parties and if so confirmation from the third party that a legal basis for sharing the exists and what that is
- Where we collect personal data directly from individuals, how the data was captured and how its intended use was communicated to those individuals that the information relates to

In addition:

- Depending on how the data is collected via our contact form, we have determined a 'reasonable' amount of time to retain and continue to use the data. The records of our data processing activities set out the data retention periods we have set for different types of data.
- We also check the data for accuracy; and

- Where consent is used for processing personal data we have a process to allow individuals to object to being contacted and to stop further communications.

Where we utilize an automated decision-making mechanism to identify who to market our products to, the suitability of individuals to buy our products and/or price products, we document:

- The purpose of the automated decision activity
- Whether an alternative manual method is available to perform this activity
- How the use of this technology is communicated to data subjects e.g. through a privacy notice, clearly stating why the use of this mechanism is necessary

At this time, we do not undertake automated decision making

Where we undertake profiling activities, we document:

- The reason for profiling
- The profiling method
- Whether any automated means are used when performing the profiling activity
- The outcome (including impact on the data subject) of the profiling activity e.g. may result in increases / decreases in premium if using telematics. Other profiling examples follow:
 - internet search and browsing history
 - data derived from existing customer relationships
 - data collected for creditworthiness assessments
 - financial and payment data
 - consumer complaints or queries
 - property ownership data
 - telematics boxes used to monitor a policyholder’s habits and movements (e.g. one fitted to the policy holder’s car to determine if they are a “good driver” and earn reward points)
 - other locational data that may be collected through smart applications

At this time, we do not undertake profiling.

Where we undertake offshore processing activities (those activities where data is transferred to / accessed from countries that are outside the EEA) we will document:

- Who the data is being sent to
- The location of where the data is being sent
- The purpose of holding the data offshore
- Who has access to the data
- The category of data being held offshore
- Whether the data is copied to the location or simply accessed from the offshore location, including the method of access and/or transfer
- The physical, technical and organizational controls used to safeguard the data.

Example **physical controls** can include:

- Manned receptions
- CCTV
- Alarmed windows (where appropriate) and doors
- Securely disposing of paper

- Visitors are signed in and out and given visitor badges
- Entrances and exits are securely locked when not in use
- The use of turnstile entrances
- Physically destroying computing equipment at the end of its useful purpose or following mechanical failure

Example **technical controls** can include:

- Encrypting data where it is stored i.e. on servers, in the Cloud, on how located workstations
- Encrypting data during transit (using SSL on websites, encrypting data backup tapes, encrypting laptops, using encrypted USB's)
- Restricting access to data to authorized users for approved purposes
- Security testing applications and IT infrastructure
- Monitoring and auditing access to personal data through the use of security information and event management solutions
- Being able to preventing / detecting data loss through the use of intruder prevention and detections solutions
- Electronically erasing data
- Data anonymization

Example **organizational controls** can include:

- A documented privacy risk framework including supporting policies and processes such a data protection policy, privacy notices, information security policy, acceptable use policy and processes for responding to subject access requests
- Assigning a senior member of management as being accountable for meeting statutory requirements
- Delegating a privacy representative or DPO where appropriate
- Documented joiners, movers, leavers and employee transfer process
- Documented data breach management processes
- Documented and tested business continuity management and IT disaster recovery procedures
- Contractual clauses stating what the data can be used for, who can access the data, authorized data storage locations, authorized support locations, what should happen to the data at the end of the service agreement and confirm rights of audit and ownership over the data
- Where the data is transferred to a third party, assurances gained about the third party's physical, technical and organizational data safeguarding controls
- The lawful basis permitting the transfer of data e.g. consent, performance of a contract, legitimate interest
- How the transfer has been communicated to data subjects e.g. through a privacy notice

At this time, we do not undertake offshore processing activities

Where we use third party processors or outsourcers (including hosted online services) including IT service providers, we shall document:

- The name of the supplier
- A description of the services being provided e.g. to provide payroll services
- The operational reliance on the provider
- The location of the third party

- The category of data being accessed
- Whether access is onsite / offsite
- If offsite, the method of access
- If the data is externally hosted (cloud based), the name and platform of the provider
- Whether the supplier requires copies of data for application support, development of maintenance purposes
- If the supplier transfers the data internationally
- A description of technical, physical and organizational controls to safeguard the data
- If requiring copies of personal data:
 - Whether an understanding has been gained on third party technical and organizational data safeguarding measures
 - Whether data ownership, uses, agreed and approved data storage locations are documented within the contractual arrangements
 - Document within the contract what should happen to the data at the end of any contractual arrangement

At this time, we do use third party processors and outsourcers

9. Individual Rights

The GDPR and UK data protection law grants data subject specific rights of access where their personal data is being processed. Key requirements center on individuals being able to request information being held, for what purpose, how the data was gathered, who the data is shared with, where the data is located, how the data is safeguarded, to request the rectification and the deletion of data and to object to the processing of data, including preventing further processing. Specific rights are as follows:

- 1) Information to be provided where personal data are collected from the data subject:

This requirement focuses on the collection / creation of personal data. Compliance is achieved through the use of privacy notices, outlining privacy requirements within terms of business, commercial contracts and contracts of employment.

- 2) Information to be provided where personal data has not been obtained from the data subject:

Additional requirements are present when receiving personal data from other parties, these are:

- Setting out the categories of personal data
- The source where the personal data originates from and whether it came from publicly accessible sources

Privacy notices should highlight the use of these third parties, stating the reason for using the third party.

- 3) Right of access

Data subjects have the right to request details on what information is being held on about them, for what purpose, how the data is used, how long the data is retained for, who it is shared with and whether the data is transferred abroad. It is likely most requests from data subjects will center on the data being held and purpose. Compliance is achieved by validating requests and the identity of the

individual making the request and to responding to requests within the mandated time frame. See appendix B for details on process requirements.

4) Right to rectification

Data subjects have the right to request that any data held on them is rectified is inaccurate or incomplete. Compliance is achieved by validating requests and the identity of the individual making the request and preventing further processing whilst the inaccurate data is rectified. See appendix C for details on the handling process.

5) Right to erasure ('right to be forgotten')

Data subjects have the right to request that any data held on them is deleted however this does not necessarily mean that the data needs to be deleted. In processing such requests, we will consider our lawful basis for retaining such data and the consequences on the services we provide of deleting such data, if any. Requests should be acted on as soon as they are received. See appendix D for details on the handling process.

6) Right to restrict processing

Data subjects have the right to request that data processing is restricted if the data is no longer required for its original purpose, the data collected is excessive for its purpose, the processing is unlawful or the data is inaccurate.

7) Right to data portability

Data subjects have the right to request that any personal data relating to them is provided to them in a machine-readable format. Organizations are under no obligation to import any that has been provided to a data subject in this way. We shall determine likely circumstances where individuals might exercise the portability right.

8) Right to object

Data subjects have the right to object to the processing of personal data relating to them, particularly where the personal data is being used for profiling and/or marketing purposes. Where valid and no lawful basis exists for continuing to process the data, we are required to prevent further processing of the data. See appendix F for details on the handling process.

9) Right to be informed about automated individual decision-making, including profiling

Data subjects have right to be informed on activities where automated decision making or profiling is performed on their data. Compliance is achieved through the use of privacy notices, outlining privacy requirements, commercial contracts and contracts of employment. See Appendix G for details on the handling process.

We will maintain a register of requests from data subjects and third parties about data subject's individual rights:

- The date the request was received
- How the request was received
- The name of the individual making the request
- Method used for confirming the individual's identity
- Whether the request is legitimate or not
- If not legitimate, then documenting why not
- Documenting any circumstances where the Company is unable to fulfil or part-meet the request
- Next steps
- Response date
- Closure date

Data subjects have the right to be informed when the data relating to them has been rectified, restricted or erased. As part of our processes and procedures we shall determine likely scenarios where we are required to comply with this right.

10. Data Protection Officer

Certain organizations are required to appoint a Data Protection Officer. The appointing of a DPO centers on the volume of personal data being processed, the category of data being processed and the processing activity.

Organizations must appoint a DPO if they:

- Carry out large scale systematic monitoring of individuals (for example, online behavior tracking); or
- Carry out large scale processing of special categories of data or data relating to criminal convictions and offences.

We have reviewed the regulations and associated guidance and have determined that, we are not required to appoint a formal Data Protection Officer. This role is fulfilled by Keeley C. Wilkinson our customer service manager our data protection representative.

Where the Company is required to appoint a DPO, responsibilities shall include the following:

- To inform and advise the organization and its employees about their obligations to comply with the GDPR and other data protection laws.
- To monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments; train staff and conduct internal audits.
- Be the first point of contact for supervisory authorities and for individuals whose data is processed (employees, customers etc).
- Provide MI reporting on an [to be agreed basis] to senior management on meeting GDPR requirements, particularly around access requests and to provide visibility on non-compliance issues.

We have reviewed the regulations and associated guidance and have determined that we are not required to appoint a formal Data Protection Officer. However, to ensure appropriate accountability and governance, we feel it is appropriate to appoint a Data Protection Representative to ensure compliance with GDPR obligations and this role is fulfilled by Keeley C. Wilkinson our customer service manager.

When requested, employees shall fully co-operate with requests for assistance. Non-cooperation may be treated as a disciplinary offence.

11. Breach Notification

Key requirements center on the ability to assess impact and to report 'material' data loss incidents to the Information Commissioner's Office within 24-72 hours (not working hours) of becoming aware of the event. Where the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we are required to inform data subjects without undue delay.

We maintain a data breach management process that includes the following:

- 1) To report data security and data loss incidents to info@p2pglobal.io
- 2) A central log to record the data breach incident detailing:
 - What has happened
 - How and when the firm became aware
 - The category of data
 - The significance of the incident (this is determined by the category of data that has been lost)
 - Potential impact to the Company and data subjects
 - Initial actions including timescales
 - Next steps, including whether data subjects and the relevant supervisory authority need to be informed, including timescales
 - Follow-up actions
- 3) Agreed lines of escalation and communication for serious data breach issues;
- 4) Contact details for those who are the first point of contact and escalation points, including out of hours contact details;
- 5) Where the Company is required to notify the Regulator, the following information will be provided:
 - a description of the nature of the personal data breach including, where possible:
 - the categories and approximate number of individuals concerned; and
 - the categories and approximate number of personal data records concerned;
 - Data Protection Representative Keeley C. Wilkinson will provide further information via info@p2pglobal.io
 - a description of the likely consequences of the personal data breach; and
 - a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.

Those responding to the breach are authorized to immediately perform or to request an immediate containment activity to lessen the impact of the breach e.g. where an IT system is being compromised or data is exposed.

As part of our wider breach management process, we will also consider whether it is appropriate to notify the Regulator under both Principle 11 – Transparent and open communications with the Regulator but also whether the breach may be regarded as a notifiable breach due to both the nature and size of the breach. See the separate breach management process for further details.

Examples of data breaches include:

- The accessing of personal data by an unauthorized third party;
- The sending of personal data to an incorrect recipient;
- Computing devices containing personal data being lost or stolen;
- Alteration of personal data without permission; and

- The loss of availability of personal data.

12. Privacy by Design

We are obliged to meet key privacy by design and default requirements which center on us identifying and remediating inherent risk when processing personal data.

There are certain situations where we are required to perform a data privacy impact assessment (DPIA) prior to the processing of new data processing activities. This is necessary where:

- The processing is likely to result in a high risk to the rights and freedoms of individuals, including profiling and where decisions that have legal effects or similarly significant effects on individuals i.e. automated decision-making.
- Large scale processing of special categories of data or personal data relation to criminal convictions or offences.
- Large scale, systematic monitoring of public areas (CCTV).

However, we recognize that privacy and data protection is a key consideration in the early stages of any project, and then throughout its lifecycle. For example, when:

- building new IT systems for storing or accessing personal data;
- developing new services or strategies that have privacy implications;
- embarking on a data sharing initiative; or
- using data for new purposes.

As such, we undertake a data privacy impact assessment (DPIA) when undertaking such projects in order to assess risk in proposed data processing activities. At a minimum the DPIA shall capture the following information:

- The proposed activity;
- The purpose of the activity;
- The category of the data being collected / processed;
- The impact on individuals should the data enter the public domain in an uncontrolled manner;
- How and when the data is collected / generated;
- Whether we are intending to use personal data outside of its original purpose and if so, whether the intended use remains lawful;
- Appropriate data security requirements;
- System and user requirements that will help to safeguard data and comply with data protection and privacy legislation, particularly in relation to data subject rights requests;
- How long the data should be retained for;
- Next steps (if any); and
- Activity approval and approved by.

DPIA activities shall be recorded within a central register.

13. Data Security

Key requirements center on organizations implementing data security controls which safeguard personal data, commonly this is known as the data security model. Controls

may vary according to the size of the organization, its commercial activities, and the volume of personal data being processed and the category of personal data.

We have implemented appropriate technical and organizational data security controls to protect the confidentiality, integrity and availability of personal data. Our controls include the following:

- Encrypting data during transit (as it's being communicated and/or physically transported from one location to another);
- Encrypting data at rest i.e. where data is stored. Examples include data held on data backup tapes, on file servers, laptops, workstations and so-called smart appliances. N.B. Personal data that is stored in the cloud or hosted externally should also be encrypted;
- Restricting access to data to authorized users for approved purposes
- Periodically security testing applications, services and infrastructure for vulnerabilities, known exploits and configuration errors;
- Maintaining a staff leavers process that removes access to IT services (including cloud and hosted services) on an agreed data
- Maintaining a clear desk policy where paper based materials are secured at the end of the working day or during periods of prolonged absence;
- Securely shredding paper based materials;
- Securely disposing of equipment containing personal data at the end of their intended purpose or following mechanical failure e.g. data held on workstations, laptops, servers, printers and scanners;
- Erasing data at the end of its intended purposes, including activities where computer equipment is assigned from one user to another.