



# DATA PROTECTION POLICY

Chris Janes

## Document Control

Version	Author	Date	Details
1.00	Chris Janes	29 <sup>th</sup> April 2020	Original

## Data Protection Policy

WithDave's Registered Data Controller with the Information Commissioners Office is Chris Janes, and it is his responsibility to communicate to all staff and freelancers the steps we must take to ensure the security of all information we take and hold about our clients. WithDave Limited aims to fulfil its obligations under the Data Protection Act 1998 to the fullest extent. All data users will be expected to process and manage any personal data according to company rules and procedures.

The key point here is that personal data is sensitive, and care must be taken to respect this. As such, the course pack and especially Booking Forms should not be left out in the open, lost or neglected. They should be passed back to office staff or Directors with due care and should be stored securely in the office or destroyed.

Extra care should be taken to ensure our digital security as individuals and as an organisation when handling personal data considering the importance of Date Protection. All clients will be given the option to have all their personal data destroyed, both digitally and physically, except where this is needed for record-holding or the issuing of governing body qualifications.

All subcontractors and clients will be informed of the information that WithDave Limited is storing and using about them and will be asked to give their consent for use of this data when signing booking forms, contracts and similar documents.

The following statements should be included in any contracts entered, and by agreeing to these Operating Procedures employees/freelancers agree to these clauses:

- For the purposes of the Data Protection Act 1998 you consent to WithDave Limited holding and processing personal data including sensitive personal data of which you are the subject.
- WithDave Limited will need to keep information about you for various reasons connected with our engagement. The sort of information we will hold may include information for payroll purposes, references, contact details, employment records, reviews and disciplinary records.
- The information we will hold will be for our management and administrative use only. WithDave Limited will also process data in order to respond to enquiries from legitimate external bodies, such as requests for references in the event of you quoting WithDave Limited as a referee, HMRC enquiries or the police. You may access the data on your personal file on request in writing for a fee of £25. Any request will be action within 40 day of receipt of the written request.

The Company Directors and Managers are the only authorised controllers of personal data.

1. Due to the nature of our business, WithDave Limited may retain Booking Forms and DBS checks and references beyond the recommended six-month period in order to provide evidence that we have not been negligent in our procedures
2. Information obtained through Booking Forms/DBS checks will not be shared with other companies, employers or any third party without the consent of the person the information relates to.
3. Copies of references given by WithDave Limited will be kept for seven years.
4. Employee payroll, tax and sickness records will be kept for at least seven years and accident records for twelve years.
5. All Director Documents will be kept for 7 years beyond when they leave the company
6. All out of date data will be properly destroyed.