**Palitri International OOD**

**DATA PROTECTION POLICY & PROCEDURES**

***Palitri International*** ltd is an Official Master Distributor for Noble Manhattan Coaching, and is trading as Noble Manhattan Europe-CE a.k.a Noble Manhattan Bulgaria

**Context and overview**

**Key details**

* Policy prepared by: Katrin Prentice
* Approved by management on: 22/04/2018
* Policy became operational on: 22/04/2018
* Next review date: 01/04/19

**Introduction**

***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE needs to gather and use certain information about individuals.

These can include students, faculty, customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company’s data protection standards – and to comply with the law.

**Why this policy exists**

This data protection policy ensures ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE :

* Complies with data protection law and follows good practice
* Protects the rights of staff, customers and partners
* Is open about how it stores and processes individual’s data
* Protects itself from the risks of a data breach

**Data Protection Law**

The Data Protection Act 1988 describes how organisations – including ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE – must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside of the European Economic Area (EEA) unless that country or territory also ensures an adequate level of protection

**People, risks and responsibilities**

**Policy scope**

This policy applies to:

* The head office and any future branches of ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE
* The locations of permanently based remote workers
* All staff and volunteers of ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE
* All contractors, suppliers and other people working on behalf of ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

* Names of individuals
* Postal addresses
* Email addresses
* Telephone numbers
* .. plus any other information relating to individuals and/or their business

**Data protection risks**

This policy helps to protect ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE from some very real data security risks, including:

**Breaches of confidentiality**. For instance, information being given out inappropriately

**Failing to offer choice**. For instance, all individuals should be free to choose how the company uses data relating to them.

**Reputational damage**. For instance, the company could suffer if hackers successfully gained access to sensitive data.

**Responsibilities**

Everyone who works for or with ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE has some responsibility for ensuring data is collected, stored and handled appropriately, and that it is processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

The Company Directors, **Katrin Prentice and Brian Prentice** are ultimately responsible for ensuring that ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE meets its legal obligations.

The Data Protection Officer, Katrin Prentice, is responsible for:

* Keeping the Company Director and management team updated about data protection responsibilities, risks and issues
* Reviewing all data protection procedures and related policies, in line with an agreed schedule
* Arranging data protection training and advice for the people covered by this policy
* Handling data protection questions from staff and anyone else covered by this policy
* Dealing with requests from individuals to see the data ***Palitri International*** holds about them (also called ‘subject access requests’)
* Checking and approving any contracts or agreements with third parties that may handle the company’s sensitive data

The IT Manager, Brian Prentice, is responsible for:

* Ensuring all systems, services and equipment used for storing data meet acceptable security standards
* Performing regular checks and scans to ensure security hardware and software is functioning properly
* Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.

The marketing director Katrin Prentice, as well as the various Coaching Support Group Presidents and Strategic Distributors, are responsible for:

* Approving any data protection statements attached to communications such as email and letters
* Addressing any data protection queries from journalists or media outlets like newspapers
* Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles

**General staff guidelines**

* The only people able to access data covered by this policy should be those who need if for their work
* Data should not be shared informally. When access to confidential information is required this can be requested from Gail O’Donovan
* ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE will provide training to all employees to help them understand their responsibilities when handling data.
* Employees should keep all data secure by taking sensible precautions and following the guidelines below.
  + In particular, strong passwords must be used and they should never be shared
  + Personal data should not be disclosed to unauthorised people either within the company or externally
  + Data should be regularly reviewed and updated if it is found to be out of date. If no longer required it should be deleted and disposed of.
  + Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection

**Data storage**

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

* When not required, the paper or files should be kept in a locked drawer or filing cabinet
* Employees should make sure paper and printouts are not left where unauthorised people could see them like on a printer
* Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

* Data should be protected by strong passwords that are changed regularly and never shared between employees
* If data is stored on removable media these should be kept locked away securely when not being used
* Data should only be stored on designated drives and servers, and should only be uploaded to approved cloud computing services
* Data should be backed up frequently. Those backups should be tested regularly, in line with the company’s standard backup procedures
* Data should never be saved directly to laptops or other mobile devices like tablets or smart phones
* All servers and computers containing data should be protected by approved software and a firewall

**Data use and Processes**

***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE aims to ensure that individuals are aware that their data is being processed and that they understand:

* how the data is being used
* how to exercise their rights

Personal data is of no value to ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

* When working with personal data, employees should ensure the screens of their computers are always locked when left unattended
* Personal data should not be shared informally. In particular, it should never be sent by email as this form of communication is not secure
* Data must be encrypted before being transferred electronically. The IT manager can explain how to send data to authorised external contacts.
* Personal data should never be transferred outside of the European Economic Area
* Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

The type and amount of personal data being processed depends on the reason ***Palitri International*** is processing it (legal reason used) and what it wants to do with it. We respect several key rules, including

* personal data must be processed in a lawful and transparent manner, ensuring fairness towards the individuals whose personal data we’re processing (‘lawfulness, fairness and transparency’).
* We need to have specific purposes for processing the data and we must indicate those purposes to individuals when collecting their personal data. We will not collect personal data for undefined purposes (‘purpose limitation’).
* We collect and process only the personal data that is necessary to fulfil that purpose (‘data minimisation’).
* We ensure the personal data is accurate and up-to-date, having regard to the purposes for which it’s processed, and correct it if not (‘accuracy’).
* We can’t further use the personal data for other purposes that aren’t compatible with the original purpose of collection.
* We ensure that personal data is stored for no longer than necessary for the purposes for which it was collected (‘storage limitation’).
* We have installed appropriate technical and organisational safeguards that ensure the security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technology (‘integrity and confidentiality’).

**Data accuracy**

The law requires ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE to take reasonable steps to ensure data is kept accurate and up to date.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible

* Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
* Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer’s details when they call.
* ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE will make it easy for data subjects to update the information ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE holds about them. For instance, via the company website
* Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database
* It is the Marketing Manager’s responsibility to ensure marketing databases are checked against industry suppression files every six months

**Subject access requests**

The right of access: Individuals will have the right to ask—and receive an answer from Noble Manhattan.

All individuals who are the subject of personal data held by ***Palitri International***, Official Master Distributor for Noble Manhattan Coaching, trading as Noble Manhattan Europe-CE are entitled to:

* Ask what information the company holds about them and why
* Ask how to gain access to it
* Be informed how to keep it up to date
* Be informed how the company is meeting its data protection obligations

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at [palitri@europ-ce.net](mailto:palitri@europ-ce.net) .The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be not be charged for their subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

**Disclosing data for other reasons**

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, ***Palitri International***, will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company’s legal advisers where necessary.

**GDPR Compliance**

The GDPR gives EU persons more rights and protections for their personal data. These include:

* The right to be informed: ***Palitri International*** must provide certain information, like a privacy notice, and emphasizes transparency over how companies use personal data.
* The right of access: Individuals will have the right to ask—and receive an answer—if an organization is processing their data. This information must be provided largely for free within one month of request.
* The right to rectification: If a person’s data is incorrect or incomplete, he or she has the right to have it corrected.
* The right to be forgotten: A person may request the removal of his or her personal data in specific circumstances.
* The right to restrict processing: Under certain circumstances, an individual can block the processing of his or her personal data.
* The right to data portability: A person can get their data for their own use anywhere they like.
* The right to object: A person can object to the use of their personal data for most purposes.

To these ends, the company has a privacy statement setting out how data relating to individuals is used by the company. This is available on the company’s website.