

FIVE BUSINESS SOLUTIONS (FBS)

“PROTECTING YOUR DATA”

Our DATA PROTECTION POLICY

1. Introduction

Five Business Solutions needs to collect and use certain types of information about the Individuals or Service Users who come into contact with **Five Business Solutions** in order to carry on our work. This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material.

2. Data Controller

Five Business Solutions (FBS) is the Data Controller which means that it determines what purposes personal information held, will be used for.

3. Disclosure

Five Business Solutions may share data with authorities as requested and required under the appropriate laws of the land (the USA).

The Individual/Service User will be made aware in most circumstances how and with whom their information will be shared.

Five Business Solutions regards the correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. **Therefore we intend to** ensure that personal information is treated ethically and correctly.

To this end, **Five Business Solutions** will adhere to the Principles of Data Protection principles as described in this policy.

Specifically, the Principles require that personal information:

- a) Shall be processed fairly and ethically and, in particular, shall not be processed unless specific conditions are met,
- b) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorized or unlawful

processing or accidental loss or destruction of, or damage to, personal information,

Five Business Solutions will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised. These include:
 - The right to be informed that processing of their information is being undertaken,
 - The right of access to one's own personal information
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information which is regarded as wrong information.
- Take appropriate technical and organizational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

4. Data collection

Informed consent is when:

- An Individual/Service User clearly understands why their information is needed, who it will be shared with, and the possible consequences of them agreeing or refusing the proposed use of the data.
- And then gives their consent.

Five Business Solutions will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, over the phone, email exchange or by completing a form.

When collecting data, **Five Business Solutions** will ensure that the Individual/Service User:

- a) Clearly understands why the information is needed
- b) Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
- c) As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used

5. Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorized staff and volunteers.

Information will be stored for only as long as it is needed or required and will be disposed off appropriately.

It is **Five Business Solutions** responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

6. Data access and accuracy

All Individuals/Service Users have the right to access the information **Five Business Solutions** holds about them. **Five Business Solutions** will also take reasonable steps to ensure that this

information is kept up to date by asking data subjects whether there have been any changes.

In addition, ***Five Business Solutions*** will ensure that:

- It has a Data Protection Officer with specific responsibility for safeguarding data.
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice.
- Everyone processing personal information is appropriately trained to do so.
- Everyone processing personal information is appropriately supervised & monitored.
- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will regularly review and audit the ways it hold, manages and uses personal information.
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to strict disciplinary action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control.

In case of any queries or questions in relation to this policy please contact the ***Five Business Solutions*** Data Protection Officer:

Signed:

Name: AMAAD KHAN

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Position: Senior Data Protection Officer.

Date: April 10th 2018.

Glossary of Terms

Data Controller – The person who (either alone or with others) decides what personal information *Five Business Solutions* will hold and how it will be held or used.

Data Protection Officer – The person(s) responsible for ensuring that *Five Business Solutions*

Follows its data protection policy.

Individual/Service User – The person whose personal information is being held or processed by *Five Business Solutions* for example: a client, an employee, or supporter.

Explicit consent – is a freely given, specific and informed agreement by an Individual/Service User in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

Processing – means collecting, amending, handling, storing or disclosing personal information.

Personal Information – Information about individuals that enables them to be identified – e.g. name and address. It does not apply to information about organizations, companies and agencies but applies to named persons, such as individual volunteers or employees.

Sensitive data – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings