

# Moonstone Associates Limited Data Protection (Privacy) Policy

|              |           |
|--------------|-----------|
| Last updated | June 2021 |
|--------------|-----------|

## Definitions

|                            |   |
|----------------------------|---|
| <b>The “Company”</b>       | means Moonstone Associates Limited, a private limited Company registered in the UK - Reg. Number 03685172 |
| <b>GDPR</b>                | means the General Data Protection Regulation  |
| <b>Responsible Person</b>  | means Jan Davis, Director.  |
| <b>Register of Systems</b> | means a register of all systems or contexts in which personal data is processed by the Company.           |

### 1. Data protection principles

The Company is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## **2. General provisions**

- a. This policy applies to all personal data processed by the Company.
- b. The Responsible Person takes responsibility for the Company's ongoing compliance with this policy.
- c. This policy is reviewed annually.
- d. The Company has registered with the Information Commissioner's Office as an organisation that processes personal data.

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Company maintains a Register of Systems.
- b. The Register of Systems is reviewed annually.
- c. Individuals have the right to access their personal data and any such requests made to the Company are dealt with in a timely manner.

## **4. Lawful purposes**

- a. All data processed by the Company is done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent is kept with the personal data.
- c. Emails include an explicit option to opt out of any further correspondence. The Company does not now or in the future intend to disclose information that it may hold on clients to any third parties for marketing purposes.

## **5. Data minimisation**

- a. The Company ensures that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Most personal data held by the Company relates to contact details for individuals undertaking current programmes, who have previously undertaken programmes or who are contacts of the Company in terms of developing or delivering programmes. Hence, primarily email and phone numbers.

## **6. Accuracy**

- a. The Company takes reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Company reviews all data held annually.
- b. This review considers what data is held, what should be retained, for how long, and why. It is normal practice to delete personal records relating to coaching and/or leadership programmes 2 years after completion of the programme.

## **8. Security**

- a. The Company ensures that personal data is stored securely using modern software that is kept-up-to-date.
- b. Any general information that the Company may hold is either in iCloud and/or Dropbox. Both systems have been assessed as GDPR compliant.
- c. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
- d. When personal data is deleted this is done safely such that the data is irrecoverable.
- e. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Company promptly assesses the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY

Andrew Porter, Director June 2021