



MIDDLETON LODGE ESTATE

DATA PROTECTION POLICY

MAY 2018



MIDDLETON LODGE ESTATE

CONTENTS

	Page
Introduction	3
Purpose	3
Data Protection Law	3
People, Risks and Responsibilities	4
Data Storage	6
Data Use	7
Data Accuracy	7
Subject Access Requests	8
Disclosing Data for Other Reasons	8



MIDDLETON LODGE ESTATE

INTRODUCTION

Middleton Lodge Events Limited needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people that 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.

Purpose:

This data protection policy ensures that Middleton Lodge Events Limited:

- 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 individuals' data
- Protects itself from the risks of a data breach.

Data Protection Law:

The General Data Protection Regulation (GDPR), comes into force on 25th May 2018. This regulates how businesses can handle the information of their customers. It replaces the previous data protection regulations.

The Data Protection Act 1998 will be replaced by the new Data Protection Bill once it has been approved by the House of Commons and House of Lords.

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 new regulations aim to ensure that our data protection framework is suitable for the digital age and a key focus will be to ensure the privacy rights of individuals.

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

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



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PEOPLE, RISKS AND RESPONSIBILITIES

Policy Scope:

This policy applies to Middleton Lodge Events Limited and all staff and volunteers, contractors, suppliers and other people working on behalf of the company.

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

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Plus any other information relating to individuals

Data Protection Risks:

This policy helps to protect Middleton Lodge Events Limited from some very real data security risks, including:

- Breaches of confidentiality - e.g. information being given out inappropriately.
- Failing to offer choice - e.g. all individuals should be free to choose how the company uses data relating to them.
- Reputational damage - e.g. the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities:

Everyone who works for or with Middleton Lodge Events Limited has some responsibility for ensuring data is collected, stored and handled appropriately and in line with this policy and data protection principles.

Compliance Manager's Responsibilities:

The Compliance Manager is ultimately responsible for ensuring that Middleton Lodge Events Limited meets its legal obligations.

Is also responsible for:

- Reviewing all data protection procedures and related policies
- 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 that Middleton Lodge Events Limited holds about them (also called 'subject access requests').

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PEOPLE, RISKS AND RESPONSIBILITIES

Compliance Manager's Responsibilities:

- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Evaluating any third party services the company is considering using to store or process data (e.g. cloud computing services).
- Approving any data protection statements attached to communications such as emails or letters
- Addressing any data protection queries from journalists or media outlets
- Where necessary, working with 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 it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from the Compliance Manager.
- Middleton Lodge Events Limited 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:
- Personal data should not be disclosed to unauthorised people, either within the company or external.
- Data should be regularly reviewed and updated if it is found to be out of date. If it is no longer required, then it should be deleted and disposed of.
- Employees should request help from the Managing Director if they are unsure about any aspect of data protection.



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DATA STORAGE

Policy Scope:

When data is stored on paper it should be kept in a secure place where unauthorised people cannot see it. This also applies 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 (e.g. 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 not shared.
- If data is stored on removable media (e.g. portable hard drive), these should be kept locked away securely when not in use.
- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing service.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Data should be backed up frequently. Those backups should be tested regularly.
- Data should never be saved directly to laptops or other mobile devices such as tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.



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DATA USE

Personal data is of no value to Middleton Lodge Events Limited 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.
- 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.

DATA ACCURACY

The law requires Middleton Lodge Events Limited to take reasonable steps to ensure data is kept accurate and up to date.

It is the responsibility of all employees who work with the 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 (e.g. confirming a customer's details when they call).
- Data should be updated as inaccuracies are discovered (e.g. if a customer can no longer be reached on their stored telephone number, it should be removed from the database).



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SUBJECT ACCESS REQUESTS

All individuals who are the subject of personal data held by Middleton Lodge Events Limited 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 to the Compliance Manager.

Individuals will not be charged for this information.

The company will aim to provide the relevant data within one month.

The company 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, Middleton Lodge Events Limited will disclose requested data. However, the company will ensure the request is legitimate, seeking assistance from legal advisers where necessary. Only the Compliance Manager can authorise this disclosure.