

PERSONAL DATA PROTECTION POLICY & STRATEGY

WOODHOUSE is committed to operating its business professionally and ethically and will endeavour to ensure that all information used in its business activities is secured and only used for activities agreed with clients, including requirements for confidentiality. This policy identifies information which WOODHOUSE considers to be personal data within the context of the applicable data protection legislation¹. It also describes the company's strategy to meet its data protection obligations.

This policy applies to all WOODHOUSE directors, employees, and contractors carrying out activities for WOODHOUSE which includes acquisition, use, data management and communication of personal information.

Personal Information

The following data is considered personal data

- Commercial information obtained marketing that identifies individuals.
- Contact lists and records relating to consultants, contractors and suppliers that identifies individuals.
- Accounting records including sales invoices, payment records and reports.

The following data may include sensitive personal information:

- Personnel records, including training records.
- Travel information (e.g. passport details)
- Records relating to information about health, ethnicity, allegations or actual prosecution records

Sensitive personal information will still be subject to the policy set out below, but attention is required to ensure that the confidentiality of sensitive information is retained, and therefore the level of control and limits of use will reflect this.

WOODHOUSE POLICY

Personal information will:

1. Only be handled in a **fair and lawful** manner:
 - We will only collect and use data where it has legitimate grounds and use information lawfully.
 - Information will not be used in ways that have an adverse effect on individuals.
 - We will ensure that individuals are made aware of the intended use of information when collecting it and have agreed to its use and are provided with **privacy notices** where appropriate.
 - We will ensure data is used as agreed with the individual.
2. **Not be processed other than for purposes agreed** with the individual and described in the privacy notice.
3. Restricted to **collection of the minimum amount** necessary for achieving its agreed purpose
4. **Accurate and kept up to date.**
5. **Retained while it is required** for the purpose agreed.
6. **Made available on request** to the individual it relates to.
7. **Secured** to ensure it is only used as agreed, and not compromised.
8. Not sent outside the European Economic Area (EEA) unless it can be assured that the requirements of this policy are achieved.

¹ Personal data is defined by the Data Protection Act 1998, with further guidance and requirements set out in the General Data Protection Regulation (GDPR) 2018. This includes data relating to a living individual who can be identified from that data, either on its own or in combination with other data held by an organisation. Sensitive personal data is further defined as information that includes, for example, records of racial or ethnic origin, political opinion, criminal history.

WOODHOUSE DATA PROTECTION STRATEGY

WOODHOUSE will ensure all staff and consultants aware of this policy and its requirements and, where appropriate, will include compliance in contract terms.

1. **Personal information only to be handled in a fair and lawful manner.** We will
 - maintain an up to date list of summary information on individuals and purposes for which it is held.
 - ensure web portal is updated in compliance with GDPR requirements for positively agreeing to data use, and correct privacy and advisory notices.
 - make the privacy notice to be available and used wherever new personal information is added – standard email (privacy notice in standard footer).
 - send out annual summary to consultants and staff and ask for (email) confirmation of information held in compliance with corresponding GDPR requirements.
 - advise contacts whenever their personal details are proposed to be added to marketing or other records and pre-agree its use via ‘opt in’ consultation, subject to our privacy statement and GDPR commitments.
2. **Not be processed other than for purposes agreed.** We will
 - Ensure all staff and consultants are aware of what constitutes personal information, and this policy.
 - All staff wishing to use personal data to check the agreement (standard notice) and ensure that if they wish to use data for another purpose this is specifically agreed in writing with the individual.
 - Ensure any feedback forms from training identify how information is to be used/retained.
3. **Restricted to minimum information required for purpose.** We will
 - Ensure that collection of personal information is restricted to information directly required for purpose, where possible use guidance. This includes web site, marketing data collection, personal training information.
4. **Accurate and kept up to date.** We will
 - Conduct an annual review of information kept for staff, consultants and suppliers.
 - Ensure that information updated as it is collected or reviewed for marketing and business contacts.
 - Make sure that personal information is restricted to that identified in summary lists for commercial information.
5. **Retained as required and for purpose agreed**
 - Consultants are advised not to keep independent lists of personal contact information, unless being used for business purposes other than WOODHOUSE business. It is the consultants’ responsibility to be able to demonstrate compliance with relevant legislation and with this policy for any information obtained or used in relation to WOODHOUSE activities.
 - The need to retain personal information will be reviewed as it is updated.
 - Personal information which is required to be retained in order to conform with financial and other rules or other compliance requirements, including retention of tax records will be retained for that period and then destroyed.
 - Personnel records will be destroyed when no longer needed for management or support of staff or for legal purposes.
6. **Made available on request**

