

# **Data Protection Policy**

As we collect personal data and information to provide our key services it is essential that we adhere to General Data Protection Regulation (GDPR) guidelines. All personal information will be dealt with professionally however it is collected, recorded and used, whether on paper or in electronic format. Healthy Performance regards the security of personal information as an imperative part of our service and as such, we aim to set the highest standards of professionalism when dealing with employee and client data.

Since 2017, aside from health screening records, we now operate a paperless organisation to further reduce the opportunity of any data protection issues. To support this, we have also streamlined our IT supply chain to ensure we only work with ISO accredited organisations for IT and hosting. The following objectives will maintain our standards.

## **Organisational Responsibility**

- > Adhere to GDPR guidelines and meet our legal obligations to specify the purposes for which information is used
- Maintain accreditation of Cyber Essentials Plus (externally audited process)
- > Carry out quarterly penetration testing on all of our systems and resolving any issues within 7 days
- Ensure that it is easy for personal data to be removed from all systems upon employee/client request
- Collect and process appropriate information only to the extent that it is required operationally
- > Continuously highlight our team's responsibility for following good information security practice
- > Provide training to adhere and maintain awareness of GDPR guidelines and best practise
- > Store paper based documents in a secure and safe environment which is locked at all times
- > Password protect access to all personal information and relevant electronic documents
- > Built all future software infrastructure with high levels of security and robustness aligned with best practise

### **Team Responsibility**

- > To keep data securely whilst in their care, never leaving paper based records onsite
- > To ensure all PC's are logged out when away from their working environment
- > To not use unsecure networks at any time
- Not disclose data verbally or in writing, accidentally or otherwise to unauthorised third parties

### **Compliance**

- > Compliance with GDPR is the responsibility of all team members both individually and collectively
- Any deliberate or reckless breach of this policy may lead to disciplinary and/or legal proceedings
- Any individual who considers the policy has not been followed should alert the Managing Director immediately

### Responsibility

It is the responsibility of each of our team to abide by this policy and continually adhere to our very high standards. As with all of our policies the Data Protection Policy will be assessed on an annual basis by the Managing Director who has ultimate responsibility for monitoring progress and identifying areas that require attention.

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