



2021 GDPR Policy

Pequod Associates Limited are committed to the protection of all data gathered about existing and prospective clients, suppliers and third parties. This Policy endeavours to explain our GDPR compliance with all Information Commissioner's Office requirements.

Our Aims

At Pequod Associates Limited (Pequod) we aim to ensure that all data collected about staff, clients and third parties is collected, stored and processed in accordance with the Data Protection Act 1998.

This policy applies to all data, regardless of whether it is in paper or electronic format.

Legislation and Guidance

This policy meets the requirements of the Data Protection Act 1998, and is based on guidance published by the Information Commissioner's Office.

Definitions

Personal data

Data from which a person can be identified, including data that, when combined with other readily available information, leads to a person being identified.

Sensitive personal data such as:

- Individuals forenames and Surnames
- Individuals place of work
- Individuals occupational role/position
- Email address
- Telephone number
- Mobile Telephone number

Processing

Obtaining, recording or holding data

Data subject

The person whose personal data is held or processed

Data controller

A person or organisation that determines the purposes for which, and the manner in which, personal data is processed

Data processor

A person, other than an employee of the data controller, who processes the data on behalf of the data controller

Data Controller

Pequod processes personal information relating to Clients, staff and Suppliers, at times information relating to third parties included as content with client projects and, therefore, is a data controller.

PequodAssociates

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Data protection principles

The Data Protection Act 1998 is based on the following data protection principles or rules for good data handling:

- Data shall be processed fairly and lawfully
- Personal data shall be obtained only for one or more specified and lawful purposes
- Personal data shall be relevant in relation to the purpose(s) for which it is processed
- Personal data shall be accurate and, where necessary, kept up to date
- Personal data shall not be kept for longer than is necessary for the purpose(s) for which it has been processed
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of, or damage to, personal data
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless the country or territory ensures an adequate level of protection for the rights and freedoms of data in relation to the processing of personal data.

Roles & Responsibilities

The Managing Director has overall responsibility for ensuring that Pequod comply with its obligations under the Data Protection Act 1998.

Day-to-day responsibilities rest with the designated employees of Pequod Associates Limited who will ensure that all additional staff members are aware of their data protection obligations, and oversee any queries related to the storing or processing of personal data.

All designated staff at Pequod Associates Limited are responsible for ensuring that they collect and store any personal data in accordance with this policy. Staff must also inform the designated employees of any changes to their personal data, such as a change of address.

Privacy/Fair Processing Notice

At Pequod Associates Limited we process data relating to those we employ to work at, or otherwise engage to work at, our business. The purpose of processing this data is to assist in the running of the business, including to:

- Enable the development of a comprehensive picture of the workforce & how it is deployed
- Inform the development of recruitment and retention policies
- Enable individuals to be paid
- Support effective performance management

Staff personal data includes, but is not limited to, information such as:

- Contact details
- National Insurance numbers
- Salary information
- Qualifications
- Absence data
- Personal characteristics, including ethnic groups
- Medical information
- Outcomes of any disciplinary procedures

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about staff with third parties without consent unless the law allows us to.

Any staff member wishing to see a copy of the information about them can do so upon request.

Storage of Records

Paper-based records and portable electronic devices, such as laptops and hard drives, that contain personal information are kept under lock and key when not in use.

Papers containing confidential personal information should not be left where there is general access.

Where personal information needs to be taken off site (in paper or electronic form), staff must sign it in and out from the office.

Passwords that are at least 8 characters long containing letters and numbers are used to access all computers, laptops and other electronic devices.

Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices

Disposal of Records

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely.

For example, we will shred or incinerate paper-based records, and override electronic files. We may also use an outside company to safely dispose of electronic records.

The General Data Protection Regulation

We acknowledge that the law has changed on the rights of data subjects and that the General Data Protection Regulation in May 2018.

We have reviewed working practices when this legislation took effect and have provided training to designated employees where appropriate.

Monitoring Arrangements

Pequod Associates Limited accept the responsibility of monitoring and reviewing this policy.

The Data Protection Officer checks compliance with this policy by, among other things, reviewing all records in line with the companies retention policy.

This document will be reviewed when the General Data Protection Regulation every 2 years.

At every review, the policy will be amended and uploaded to the company website where its accessible to all users.