

# Netready Ltd Data Policy

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## 1 About this Data Policy

This document explains how it is Netready's policy to ensure that all data in its care is collected, stored, treated, processed and disposed of in a manner that adheres to legal requirements and our own policies. Whilst legal responsibilities orientate around Personal Data, Netready will apply appropriate levels of security, precautions and protection over any customer data, be it Personal Data or non-Personal Data.

## 2 About our Privacy Notice

The Privacy Notice is a publically available document explaining, in clear terminology, what data we hold, why we process it, how it is secured and shared, and an individual's rights in relation to their data.

## 3 Personal Data owned by Netready

1. The information collected and used by Netready must be identified and logged to record where it came from and where it is used.
2. Personal data must be processed fairly and lawfully.
3. Personal data must be obtained for one or more specified and lawful purposes, and is not processed in any manner incompatible with that purpose or those purposes.
4. Personal data must be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
5. Personal data must be accurate and, where necessary, kept up to date.
6. Personal data processed for any purpose and must not be not kept for longer than is necessary.
7. Personal data must be processed in accordance with the Data Protection Act 1998 and the GDPR.
8. Security measures and procedures must be in place to ensure that no unauthorised or unlawful processing of personal data occurs, and no accidental loss or destruction of, or damage to, personal data occurs.
9. Personal data must never be transferred outside the UK
10. Personal data must never be sold to third parties.

## 4 Requests for personal data

1. Subjects can request details of their stored data from Netready, to which Netready will respond immediately (usually within one working day).

2. Subjects of Personal Data can ask for it to be updated, which Netready will action within one month
3. Subjects of Personal Data can ask for it to be erased, which if applicable will be actioned by Netready within a reasonable period depending on the complexity of the data.
4. Subjects of Personal Data can ask for their any data processing of their data to be restricted.
5. Subjects of Personal Data can object to their data being used unless it is required (e.g. contractual obligations). The objection must be stored so that the Subject's data is not used in the same way again.

## **5 Marketing**

1. Data must be obtained via legal routes
2. Any marketing performed using data is relevant, and will have options to "object", which is usually referred to as an "opt out".

## **6 Customer Data owned by the Customer being processed by Netready**

For the purposes of project development it may be necessary for Netready to handle a customer's data.

This may be personal data (names, addresses etc) or non-personal data (stock levels, IT infrastructure information etc).

Examples of processing Customer data at Netready:

1. Migration from old system new system
2. Testing new system
3. Hosting

Our responsibility and what Netready must do

1. Data will be kept secure, within the Netready network within the UK.
2. Data will be used for purposes agreed with the customer as defined in our contract/SLA with the customer.
3. Data will be removed once it is no longer required e.g. end of project development, end of hosting etc.
4. Netready will act promptly (usually one working day) in assisting the data owner (our Customer) with requests regarding their Data .e.g. removing data, reports on data
5. In rare circumstances where someone mistakenly identifies Netready as the Data Owner (when we are just the Data Processor) then we will promptly (usually one working day) pass the enquiry onto the Data Owner (our Customer) along with any advice on actions we can do to assist in resolving the enquiry.

## **7 Storage of data**

Data must be kept securely within the Netready network so that only relevant staff have access. Data must not be stored outside of the UK.

Any data stored must be documented in the Data Stores log so that it can be identified, traced and managed.

## **8 Breaches and loss of data**

This applies to any personal data owned by Netready or to any data where Netready is acting as Data Processor.

1. Any 'high risk' breaches or loss of data will result in, where possible, all applicable people being notified. For Personal Data owned by Netready this includes notifying the subject of the data when the breach/loss damages reputation, rights etc. For any Data (personal or otherwise) owned by a Customer then it is the Customer who is notified by Netready so that if need be the Customer can notify the subjects of the data.

## **9 Management and staff responsibilities**

1. Netready does not have a named Data Protection Officer, but the responsibilities of the role is taken on by management to ensure the company complies with legal and customer data requirements.
2. All employees of Netready are made aware of this policy and its implications to their role and in their day-to-day tasks.
3. Employees are able to report any issues regarding Data to management and are encouraged to do so promptly.

## **10 Updating Data Policy and Privacy Notice documents**

Management are responsible for updating these documents, and ensuring that they are up to date with the data collected and the reasons why.

These documents must be shared with staff and Subjects of the data as required.