



# Privacy Policy

## 1.0 Introduction

The Data Protection Act 1998, places legal responsibilities on organisations who collect and use personal information and gives individuals certain rights of access. The Act covers information that is structured, including data processed automatically by computer, and information which is recorded as part of a relevant filing system. The Act has been amended by the Freedom of Information Act 2000 to include all personal information whether or not it is processed automatically or part of a relevant filing structure. There are stricter requirements in the Act in respect of processing sensitive personal data. Information can be held in any format e.g. computer systems, paper records, CCTV. 'Personal information', 'sensitive personal data', 'processing' and 'relevant filing system' are defined in Appendix A. In the course of carrying out its business, Fulbright Limited ("the Company") needs to collect and use certain types of information about people such as, employees, clients, customers and suppliers, and is subject to the Act. This policy document sets out the Company's intentions to fulfil its obligations under the Act and the arrangements it has put in place to comply with it.

## 2.0 Responsibility for the Act

The Company is committed to ensuring that all staff comply with the Act. The Company has a Registered Data Controller responsible for compliance with the Act.

## 3.0 Adhering to the eight principles of the Act

The Company will collect and use personal information in accordance with the eight principles of the Act which require that: 1) Personal data shall be processed fairly and lawfully. This includes observing at least one of the conditions described in Schedule 2 of the Act (and Schedule 3 in relation to sensitive personal data). 2) Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes. 3) Personal data held for any purpose should be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed. The Company will collect and process appropriate information required only to fulfil operational needs or comply with legal requirements. 4) Personal data shall be accurate and where necessary, kept up to date. 5) Personal data shall not be kept for longer than is necessary. 6) Personal data shall be processed in accordance with the rights of data subjects under the Act. 7) Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing and against accidental loss or destruction of, or damage to personal data. 8) Personal data shall not be transferred to a Country outside the European economic area unless that Country ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data. The Company will also: a) Ensure that all staff receive training and guidance so that they understand that they are contractually responsible for complying with the law and know how to process information in accordance with the 8 principles. b) Put in place procedures for complying with the eight principles. c) Put in place appropriate technical and organisational security measures to safeguard personal information. d) Ensure that individuals are informed of the purposes for which their data will be used and that consent is sought for such use, where required by the Act.

Continued....



## Individual's Rights

The Company will ensure that individuals' can exercise their rights described in the Act, including the right to request a copy of their personal data, request that any inaccurate personal data is corrected, request that their personal data is deleted and destroyed when causing damage or distress. The Company only holds personal data that is directly relevant to its dealings with a given data subject. That data will be collected, held, and processed in accordance with the data protection principles and with this Policy. The following data may be collected, held and processed by the Company: name, email address, company office location, company department, company role and telephone number to allow set up of a user account to deliver / allow access to the Company's services. An individual can request information about the data held. The request should be in writing and give sufficient information to enable the Company to locate the information requested. A fee of £10 will be charged and the Company will respond to such requests within 40 calendar days of receipt.

## Complaints

Any complaints about the way in which the Company deals with personal information will be dealt with by the Company's Data Protection Officer who will arrange for the matter to be investigated. They can be contacted at [support@objectivemanager.com](mailto:support@objectivemanager.com). If the complainant is dissatisfied with the outcome of the investigation by the Company, they may complain directly to the Information Commissioner. Appeals against the decision of the Information Commissioner can be made to the Information Tribunal.

## Appendix A (Definitions)

"Personal information" or "personal data" is that which affects a person's privacy, whether in his/her personal or family life, business or professional capacity. It is information which will have the individual as its focus. An individual's name is unlikely to be personal data where it is not associated with any other personal information. If it is coupled with other information about him/her e.g. his/her address or phone number, it is likely to be personal information. Information about medical history, salary and bank statements are all examples of personal information. Personal information may also include any expression of opinion about the individual. Information which has something else as its focus e.g. a property survey will not be personal information. The mere fact that a person is mentioned in a document does not mean that it is personal information.

"Sensitive Personal Data" means information about a person relating to their ethnic or racial origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, and criminal records.

"Processing", in relation to information or data, means obtaining, recording, holding or using the information. Using the information would include, altering it, retrieving or consulting it, disclosing it by making it available to others, or destroying it.

"Relevant filing system" means a set of information structured, either by reference to individuals, or by reference to criteria relating to individuals, so that specific information about individuals is readily accessible.