

# Data Protection & Confidentiality Policy

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## Policy Statement

W2W Solutions Ltd is committed to implementing the General Data Protection Regulation (GDPR), EU Regulation 2016/679, to protect the privacy and data of our customers. We will:

- Process personal data fairly and lawfully.
- Only collect personal data for specified and legitimate purposes, and only process data in a way that is compatible with those purposes.
- Make sure that personal data held and processed is adequate, relevant and only limited to what is necessary.
- Take steps to ensure that personal data is accurate and kept up to date.
- Not keep personal data for longer than is necessary for the intended purposes.
- Process personal data in line with the rights of data subjects under the GDPR.
- Take suitable measures against unauthorised or unlawful processing, and against accidental loss or destruction of, or damage to, personal data.
- Not transfer personal data to a country or territory outside the European Economic Area.

See Appendix 1 for the definitions of data, personal data, sensitive data and processing.

All employees and others who process or use personal information are expected to adhere to this Policy at all times.

## Data we collect

Data collected by W2W Solutions Ltd may include, depending on our relationship with an individual:

- Name
- Date of birth
- Nationality
- Contact details (address, email, telephone)
- Job role within an organisation
- Bank details
- Special categories of data such as ethnicity, health status and criminal record

Personal details (including sensitive data) about our customer's services users may be accessed and processed as part of our consultancy services, e.g. to develop and implement new systems, deliver staff training or undertake other relevant activities. This data will be accessed via secure platforms, and normally processed within the customers' IT systems. It is the policy of W2W Solutions Ltd to use such data only for the intended purpose, and to not retain or process this outside of the terms of our Consultancy Agreement.

We do not collect personal information from children under 18.

Our website ([www.w2wsolutions.co.uk](http://www.w2wsolutions.co.uk)) uses cookies (small text files in a web browser) to assist in the effective running of our website. Visitors can opt out of cookies using their browser settings – this does not impact on their ability to navigate and use our site; and individuals cannot be identified personally from the information collected. Please see our Cookies Policy for full details.

## How we collect data

Employees will provide personal data as part of the recruitment process.

We collect customer data through:

- completion of our website contact form by potential customers
- email or telephone queries
- in the course of the delivery of our service
- data already published in the public domain (websites, publicity, social media)

## How we use data

We will use individual's data to ensure effective delivery of the service that has been requested from us, within the terms of the relevant Agreements; to respond to requests for information; to manage our relationship with individuals including communicating about our activities via email and telephone; to inform people about services and activities that may interest them; and to meet our legal obligations.

The legal bases for collecting, using, storing and transferring data are as follows:

1. Processing is necessary for the performance of a contract to which the individual is party or in order to take steps at the request of the individual prior to entering into a contract.
2. Processing is necessary for compliance with a legal obligation to which the data controller is subject.
3. Consent of the individual.
4. Legitimate interests in relation to direct marketing.

In some limited circumstances, we are legally required to share certain personal data if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## Data security

Personal data collected by us will be stored electronically in an encrypted, password-protected IT system which is only available to the data controller and authorised personnel. We will take all reasonable steps to minimise the risk of accidental loss or theft of computer equipment containing personal data. Appropriate virus and security protection will be installed to ensure the integrity of the system as far as possible.

Where manual records are held these will be held in a secure, locked filing system, accessible only to the data controller and authorised personnel. The retention of manual records by employees will be discouraged and kept to a minimum. Where this is necessary, secure storage systems will be made available.

In all cases the IT systems of employees will be regularly monitored by the data controller to ensure that data held is relevant to the individual's job role and not retained beyond the time necessary to fulfil the intended purpose. All employees will take all reasonable steps to minimise the risk of accidental loss or theft of computer equipment containing personal data. IT systems will be backed up regularly and backup files retained on an independent secure electronic system to ensure business continuity in the event of original data being lost.

## Rights of Data Subjects

Under the GDPR individuals have the right to:

1. be informed about our collection and use of their personal data. This policy should tell individuals everything they need to know, but contact us for more information.
2. access the data we hold. Individuals can request a copy of the personal data we hold about them to check it is correct and that we are processing it legally.
3. correct any information we hold about them.
4. ask us to erase your data where there is no good reason for us to hold it.
5. restrict processing of their data, e.g. we can continue to store it but not process it.
6. data portability. Individuals can request that we transmit their personal data to themselves or to a third party in a commonly used and machine readable form, e.g. CSV files, enabling other organisations to easily use their data.
7. object to us processing their personal data processing based on legitimate interests (including direct marketing and research) or the performance of a task in the public interest/exercise of official authority.

If individuals wish to exercise any of these rights please email: [helpdesk@w2wsolutions.co.uk](mailto:helpdesk@w2wsolutions.co.uk)

Individuals will not have to pay a fee to access their personal data (or to exercise any of the other rights). For security purposes we may need to request specific information to help us confirm identity and ensure an individual's right to access the personal data. We will respond to all legitimate requests within one month.

Where data subjects advise W2W Solutions Ltd in writing that they do not wish to be contacted for direct marketing purposes, the individual will be added to our suppression list to make sure this request is actioned.

## Confidentiality

Outside of personal information covered by the GDPR, this policy also covers confidential information.

Confidential Information is considered to be all information concerning the business affairs of either W2W Solutions Ltd or our customers that is not in the public domain and that is gained through work undertaken in a specified contract. This includes, but is not limited to, all

information relating to, and included in all processing and analysing of customer data, business policies, sales and marketing data, computer systems and software, research, and any other confidential information in any media used by, or the property of, either party.

W2W Solutions Ltd will use confidential information only to ensure the proper provision of the goods or services agreed and for no other purpose whatsoever. Only authorised employees or associates will have access to the information.

We will maintain the confidentiality of the information and not disclose or communicate this to other parties without our customer's consent. We further undertake to not use, reproduce, transform, or store any of the confidential information outside of our business premises unless required in delivery of the agreed service.

## Retention & Disposal

Data and confidential information will be retained as long as is necessary to fulfil the purpose for which it was gained, and to meet our legal and fiscal obligations. Information will be retained in a secure manner to prevent access by any unauthorised third party and will be returned to the customer upon completion of the activity or otherwise destroyed. All manual records containing personal or sensitive data will be shredded to ensure confidentiality.

Where IT equipment is redundant, hard disks will be wiped clean before disposal.

## Monitoring & Review

The Directors will monitor implementation of the Policy on an ongoing basis and take action to make sure it remains relevant and effective. Where an employee is found to have breached this Policy, disciplinary action will be taken in line with company procedures.

The Directors will update this Policy when changes to the business or changes to legislation make this necessary.

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## Data

This means any information that is recorded and processed electronically or within a relevant filing system.

## Personal Data

This means data which relates to an individual who can be identified either directly from that data or from the data and other information in the possession of the data controller. This includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual. This includes obvious information such as name and contact details, but also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## Sensitive Personal Data

This means data including the racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition, sexual orientation, and commission of an offence (proved or alleged).

## Data Controller

These are the people determining the purposes for which and the manner in which any personal data is processed. Stephanie Barlow of W2W Solutions Ltd is registered with the Information Commissioner's Office as Data Controller for Notification.

## Data Processor

This is any person (other than an employee of the data controller) who processes the data on behalf of the data controller. Data Processors of W2W Solutions Ltd will include employees depending on their role within the company.

## Data Subject

This is an individual who is the subject of personal data. Within W2W Solutions Ltd this includes employees and customers. It will also include individuals who supply their data directly to our customers. This data will only be accessed by W2W Solutions Ltd within the terms of our consultancy agreement to enable us to provide the agreed service to our customers.

## Processing

This means obtaining, recording, holding or carrying out any operation on the information or data, e.g. adapting or altering, retrieving, consulting or using, disclosing, aligning, combining, erasing.