

## DATA PROTECTION POLICY

### 1. Introduction

The purpose of this Policy is to:

- a. help us protect the privacy of individuals whose personal information we collect;
- b. ensure we comply with relevant data protection law;
- c. describe and promote best practices about data protection and data security; and
- d. protect us from the risks of a data protection breach.

This Data Protection Policy sets out how SENNIES Limited ("we", "our", "us", "the Company") handles the Personal Data of our clients, suppliers, employees, workers and other third parties. This Data Protection Policy applies to all Personal Data we Process regardless of the media on which that data is stored or whether it relates to past or present employees, workers, clients or supplier contacts, shareholders, website users or any other Data Subject.

This Data Protection Policy applies to anyone who works with the Company. You must read, understand, and comply with this Data Protection Policy when Processing Personal Data on our behalf and attend training on its requirements. This Data Protection Policy sets out what we expect from you for the Company to comply with applicable law. Your compliance with this Data Protection Policy is mandatory.

If you have any questions relating to this policy, please contact Georgia Sargeant (the "Responsible Person") at [info@SENNIES.co.uk](mailto:info@SENNIES.co.uk) who is responsible for this policy.

### 2. Data protection principles

The Company is committed to Processing data in accordance with its responsibilities under Data Protection Legislation. The following definitions will help you to understand this policy:

**Consent:** agreement which must be freely given, specific, informed and be an unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear positive action, signify agreement to the Processing of Personal Data relating to them

**Data Protection Legislation** includes all applicable data protection and privacy legislation in force from time to time in the UK including, but not limited to, the UK GDPR; the Data Protection Act 2018 (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003 as amended; or any successor legislation, and all other legislation and regulatory requirements in force from time to time which apply to a party relating to the use of Personal Data (including, without limitation, the privacy of electronic communications).

**Data Subject:** a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.

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**Explicit Consent:** consent which requires a very clear and specific statement (that is, not just action).

**Personal Data Breach:** any act or omission that compromises the security, confidentiality, integrity, or availability of Personal Data or the physical, technical, administrative, or organisational safeguards that we or our third-party service providers put in place to protect it. The loss, or unauthorised access, disclosure, or acquisition, of Personal Data is a Personal Data Breach.

**Personal Data:** any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Special Categories of Personal Data and Pseudonymised Personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location, or date of birth) or an opinion about that person's actions or behaviour.

**Processing or Process:** any activity that involves the use of Personal Data. It includes obtaining, recording, or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing, or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

**Pseudonymisation or Pseudonymised:** replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.

**Register of Systems** means a register of all systems or contexts in which personal data is processed by the Company.

**Special Categories of Personal Data:** information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

**UK GDPR:** the retained EU law version of the General Data Protection Regulation ((EU) 2016/679). Personal Data is subject to the legal safeguards specified in the UK GDPR.

Data Protection Legislation requires that Personal Data shall be:

- a. Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further Processed in a manner that is incompatible with those purposes; further Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are Processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are Processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data are Processed; Personal Data may be stored for longer

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periods insofar as the Personal Data will be Processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by in order to safeguard the rights and freedoms of individuals; and

- f. Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### 3. General provisions

- a. This policy applies to all Personal Data Processed by the Company.
- b. The Responsible Person shall take responsibility for the Company's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Company shall register with the Information Commissioner's Office as an organisation that Processes Personal Data.

### 4. Lawful, fair and transparent Processing

- a. To ensure its Processing of data is lawful, fair and transparent, the Company shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their Personal Data and any such requests made to the Company shall be dealt with in a timely manner.

### 5. Lawful purposes

- a. All data Processed by the Company must be done on one of the following lawful bases: Consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Company shall note the appropriate lawful basis in the Register of Systems.
- c. Where Consent is relied upon as a lawful basis for Processing data, evidence of opt-in Consent shall be kept with the Personal Data.
- d. Where communications are sent to individuals based on their Consent, the option for the individual to revoke their Consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Company's systems.

### 6. Data minimisation

- a. The Company shall ensure that the collection of Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are Processed. It will not Process Personal Data for any reason unrelated to the specific purpose outlined.
- b. The Company will not collect excessive data and will ensure any Personal Data collected is

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adequate and relevant for the intended purposes.

- c. The Company will ensure that when Personal Data is no longer needed for specified purposes, it is deleted or anonymised in accordance with the Company's data retention guidelines.

## 7. Accuracy

- a. The Company will ensure that the Personal Data it uses, and holds is accurate, complete, kept up to date and relevant to the purpose for which it is collected. We must check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. We must take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.
- b. Where necessary for the lawful basis on which data is Processed, steps shall be put in place to ensure that Personal Data is kept up to date.

## 8. Training

- a. We are required to ensure any contractors or employees working for the Company have undergone adequate training to enable them to comply with data privacy laws. We must also regularly test our systems and processes to assess compliance.
- b. We will implement annual data privacy related training to ensure we are all up to date with current guidelines.
- c. We will regularly review all the systems and processes under our control to ensure they comply with this Data Protection Policy and check that adequate governance controls and resources are in place to ensure proper use and protection of Personal Data.

## 9. Archiving / removal

- a. To ensure that Personal Data is kept for no longer than necessary, the Company shall put in place an archiving policy for each area in which Personal Data is Processed and review this Process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## 10. Transfer Limitation

- a. Data Protection Legislation restricts data transfers to countries outside the UK to ensure that the level of data protection afforded to individuals by the UK GDPR is not undermined. Such transfer across borders occurs when you transmit, send, view or access that data in or to a different country.
- b. You may only transfer Personal Data outside the UK if one of the following conditions applies:
  - i. the UK has issued regulations confirming that the country to which we transfer the Personal Data ensures an adequate level of protection for the Data Subject's rights and freedoms;
  - ii. appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved for use in the UK, an approved code of conduct or a certification mechanism;

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- iii. the Data Subject has provided Explicit Consent to the proposed transfer after being informed of any potential risks; or
- iv. the transfer is necessary for one of the other reasons set out in the UK GDPR including the performance of a contract between us and the Data Subject, reasons of public interest, to establish, exercise or defend legal claims or to protect the vital interests of the Data Subject where the Data Subject is physically or legally incapable of giving Consent and, in some limited cases, for our legitimate interest.

## 11. Sharing Personal Data

- a. Generally, we are not allowed to share Personal Data with third parties unless certain safeguards and contractual arrangements have been put in place.
- b. You may only share the Personal Data we hold with another employee, agent, or representative if the recipient has a job-related need to know the information and the transfer complies with any applicable cross-border transfer restrictions.
- c. You may only share the Personal Data we hold with third parties, such as our service providers, if:
  - i. they have a need to know the information for the purposes of providing the contracted services;
  - ii. sharing the Personal Data complies with the Privacy Notice provided to the Data Subject and, if required, the Data Subject's Consent has been obtained;
  - iii. the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
  - iv. the transfer complies with any applicable cross-border transfer restrictions; and
  - v. a fully executed written contract that contains UK GDPR-approved third party clauses has been obtained.

## 12. Security

- a. The Company shall ensure that Personal Data is stored securely using modern software that is kept-up-to-date.
- b. Access to Personal Data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When Personal Data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## 13. Breach

- a. The UK GDPR requires us to notify any Personal Data Breach to the Information Commissioner and, in certain instances, the Data Subject.
- b. We have put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where we are legally required to do so.
- c. In the event of a breach of security leading to the accidental or unlawful destruction, loss,

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alteration, unauthorised disclosure of, or access to, Personal Data, the Company shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

**14. Acknowledgement of receipt and review**

I, ....., acknowledge that on ....., I received and read a copy of SENNIES Limited’s Data Protection Policy, dated 1 November 2023, and understand that I am responsible for knowing and abiding by its terms. I understand that the information in this Data Protection Policy is intended to help all who work with the Company work together effectively on assigned job responsibilities and assist in the use and protection of Personal Data. This Data Protection Policy does not set terms or conditions of employment or form part of an employment contract.

Signed .....

Printed Name .....

Date .....

This Policy has been approved and authorised by:

Name: Georgia Sargeant

Date: 1 November 2023

Due for Review by: 1 November 2024

Signature: G.SARGEANT