



# **Information Protection and Privacy Policy**

## Contents

<b>1.0</b>	About this Policy .....	3
1.1	Introduction.....	3
1.2	Document Control .....	3
1.3	Policy Purpose and Applicability .....	3
<b>2.0</b>	The Policy .....	4
2.1	General.....	4
2.2	Scope.....	5
<b>3.0</b>	General Principles.....	5
<b>4.0</b>	Roles and Responsibilities .....	6
<b>5.0</b>	Information about the Personal Information Data we hold.....	7
5.1	Types of Data.....	7
5.2	How We Collect Personal Information Data.....	8
5.3	The Type of Personal Information We Collect and Store .....	8
5.4	How We Use Personal Information .....	9
5.5	How We Ensure Your Personal Information is Kept Secure .....	9
5.6	What Will We Do in the Event of Data Being Compromised.....	9
5.7	Our Lawful Basis for Processing this Data .....	10
5.8	Data Retention .....	10
<b>6.0</b>	Data Subjects Rights .....	10
<b>7.0</b>	Key Enablers.....	11
<b>8.0</b>	Risks .....	11
<b>9.0</b>	Contacting Media Village.....	11

## 1.0 About this Policy

### 1.1 Introduction

Information is a major asset that Media Village has a responsibility and requirement to protect. Protecting information assets is not simply limited to covering the stocks of information (electronic data or paper records) that the organisation maintains. It also addresses the people that use them, the processes they follow and the physical computer equipment used to access them.

### 1.2 Document Control

The document is to be reviewed annually and updated.

Date	Summary of Changes	Approval

### 1.3 Policy Purpose and Applicability

This purpose of the Information Protection and Privacy Policy is to ensure that all Media Village employees fully understand the company’s commitment to rigorously comply with all forms of the General Data Protection Regulations (GDPR). It is also

to ensure that all personnel whom we deal with either as prospective customers, customers, suppliers or employees fully understand the company's commitment to meet or exceed all the GDPR legislation that is relevant to the company and the services it provides.

For the purposes of this policy "employees" means all persons working for Media Village including permanent, fixed term, and temporary staff, any third party representatives, agency workers, volunteers, interns, agents and sponsors engaged with Media Village.

This policy applies to all employees of any company trading as part of Media Village.

This policy applies to all personal and sensitive personal data processed on computers and stored in manual (paper based) files. This includes information supplied by a third party as part of a contract to process that data commercially, and information collected that is used either in pursuit of our commercial interests or in order to effectively manage our people, customers and suppliers. It aims to protect and promote the rights of individuals and the company.

## 2.0 The Policy

### 2.1 General

GDPR is designed to protect individuals and personal data, which is held and processed on their behalf. The Act defines the individual as the 'data subject' and their personal information as 'data'. These are further defined as:

(i) Data Subject: Any living individual who is the subject of personal data whether in a personal or business capacity.

(ii) Data: Any personal information which relates to a living individual who can be identified. This includes any expression of opinion about the individual.

(iii) Data is information stored electronically i.e. on computer, including word processing documents, emails, computer records, CCTV images, microfilmed documents, backed up files or databases, faxes and information recorded on telephone logging systems.

(iv) Manual records which are structured, accessible and form part of a 'relevant filing system' (filed by subject, reference, dividers or content), where individuals can be identified and personal data easily accessed without the need to trawl through a file.

## 2.2 Scope

This policy applies to all the systems, people and business processes that make up the business's information systems. This includes all Executives, Committees, Departments, Partners, Employees, contractual third parties and agents of the Organisation who have access to Information Systems or information used for purposes necessary to effect Media Village's commercial objectives.

## 3.0 General Principles

The General Data Protection Regulations sets legislative requirements for organisations processing personal data (referred to under the Act as 'Data Controllers'). Media Village will be open and transparent when processing and using private and confidential information by ensuring we follow the 8 Data Protection Principles of good data handling:

Principle 1: Personal data shall be obtained and processed fairly and lawfully.

Principle 2: Personal data shall be obtained only for the specified and lawful purposes and shall be processed for limited purposes.

Principle 3: Personal data shall be adequate, relevant and not excessive in relation to the purpose for which it is obtained.

Principle 4: Personal data shall be accurate and kept up to date.

Principle 5: Personal data shall not be kept for longer than necessary.

Principle 6: Personal data shall be processed in accordance with the rights of the data subject under the Data Protection Act 1998.

Principle 7: Personal data (manual and electronic) must be kept secure. It must never be saved on any local PC and must always be saved to a secure area on the system.

Principle 8: Personal data shall not be transferred outside the European Union unless that country provides adequate levels of protection for the rights of the data subject.

Media Village recognises and understands the consequences of failing to comply with the requirements of the General Data Protection Regulations which may result in:

- Criminal and civil action;
- Fines and damages;
- Personal accountability and liability;
- Suspension/withdrawal of the right to process personal data by the Information Commissioners Office (ICO);
- Loss of confidence in the integrity of Media Village's systems and procedures;
- Irreparable damage to our reputation.

Media Village may consider taking action, in accordance with Media Village's Disciplinary Procedure, where employees do not comply with this policy.

## 4.0 Roles and Responsibilities

Employees will not attempt to gain access to information that is not necessary to hold, know or process. All information which is held will be relevant and accurate for the purpose for which it is required. The information will not be kept for longer than is necessary and will be kept secure at all times.

Media Village will ensure that all personal or sensitive personal information is anonymised as part of any evaluation of assets and liability assessments except as required by law.

Employees who manage and process personal or sensitive personal information will ensure that it is kept secure and where necessary confidential. Sensitive personal information will only be processed fairly and lawfully and in line with the provisions set out in the Data Protection Act 1998 and only processed in accordance with instructions set out by the respective Data Controllers.

Media Village will ensure that all staff are made aware of the reasons why personal and sensitive personal data is being processed including:

- how it will be processed
- who will process it
- how it will be stored and
- how it will be disposed of when no longer required.

Media Village will ensure the protection of all information assets within the custody of the business.

Media Village will ensure high standards of confidentiality, integrity and availability of information will be maintained at all times.

## 5.0 Information About the Personal Information Data We Hold

### 5.1 Types of Data

(i) Personal Data: Any information which relates to a living individual who can be identified from the information. It also extends to any information which may identify the individual. Examples of personal data:

- A person's name and address (postal and email)
- Date of birth
- Statement of fact
- Any expression or opinion communicated about an individual
- Minutes of meetings, reports
- Emails, file notes, handwritten notes, sticky notes
- CCTV footage if an individual can be identified by the footage
- Employment applications
- Spreadsheets and/or databases with any list of people set up by code or staff number
- Employment or education history

(ii) Sensitive Personal Data: Any information relating to an individual's:

- Ethnicity
- Gender
- Religious or other beliefs
- Political opinions
- Membership of a trade union
- Sexual orientation
- Medical history
- Offences committed or alleged to have been committed by that individual

## 5.2 How We Collect Personal Information Data

Media Village collect personal information via the following means:

1. Personal Meetings
2. Telephone Calls
3. Online web and printed forms
4. Research or referrals
5. Transferred by a third party in relation to services offered (e.g. mail fulfilment)
6. Employee details during induction and employment

## 5.3 The Type of Personal Information We Collect and Store

Collected and stored by Media Village:

- Name
- Job Title
- Email address
- Employer
- Employers address
- Telephone number
- Bank account details restricted to account name, sort code and account number
- Additional personal information such as hobbies, interests, family details, etc. - used to establish rapport.

Transferred to Media Village by a Third Party:

Information is transferred to Media Village as part of a contract to process that data for commercial objectives. The data supplied may include:

- Name
- Job Title
- Home address
- Family details
- Income details
- Email address
- Telephone number
- Mobile number



## 5.4 How We Use Personal Information

Media Village may use personal information to:

- Administer and pay our employees
- Contact our customers relating to past, present and future sales
- Collect payments and send invoices and statements
- Administer and personalise our websites or emails
- Send marketing information
- Supply products and services to our customers

Media Village employs a “need to know” policy of sharing information between its employees, agents or subcontractors and will only disclose sufficient information to allow our employees, agents or subcontractors to complete their objectives and as such these parties will be obligated to use that personal information in accordance with the terms of this privacy statement.

In addition to the uses described above Media Village may disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

## 5.5 How We Ensure Your Personal Information is Kept Secure

Media Village will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

All employee information will be kept and stored securely on secure servers and accessed by password-protected payroll, accounting and time recording software. Some information is held on paper-based records and these are held in lockable filing cabinets held in the Accounts Office and strictly controlled.

All customer and supplier details will be kept stored securely on secure servers and accessed by password-protected CMS and accounting software.

## 5.6 What Will We Do in the Event of Data Being Compromised

If in any event we feel that the data has been compromised, lost or stolen we will immediately inform all interested parties and take immediate action to mitigate the compromise.

## 5.7 Our Lawful Basis for Processing this Data

If the personal information has been collected by Media Village we will ensure we have your permission to use the data necessary for the fulfilment of services provided or in order to take steps to procuring further orders.

If the personal information is transferred to Media Village for the purposes of fulfilling a service we will obtain a statement from the transferee that they have the consent of all personnel to which the information refers before entering into a contract.

## 5.8 Data Retention

All data transferred to us by third parties will be stored in a restricted area of our secure server. It will be held there until either the data is no longer required or the transferee has requested us to destroy the data. Data transferred to us will be disposed of using an electronic shredder. Data that has not been used will be destroyed by secure means after a period no greater than 12 months.

All data collected on employees will be held for at least 5 years after employment ceases for archiving purposes unless requested to do otherwise.

All data collected on customers or potential customers will be held whilst ever that data is considered useful or unless requested to delete the data. The data will be reviewed at least annually.

## 6.0 Data Subjects Rights

All personnel that Media Village hold personal information on have the following rights:

- The right to be informed of the data being held.
- The rights of access to the information being held.
- The rights to rectification of any errors in the information being held.
- The rights to have the information destroyed.
- The rights to restrict the use of the information.

## 7.0 Key Enablers

Media Village will draw up and maintain inventories of all important information assets.

Access to information assets, systems and services must be conditional on acceptance of the appropriate Acceptable Usage Policy and Information Security Policy.

Users should not be allowed to access information until the Managing Director is satisfied that they understand and agree the legislated responsibilities for the information that they will be handling.

Personal data of any sort must not be disclosed to any other person or organisation without confirming that they have the right to access that data in writing nor via any insecure methods including paper-based methods, fax and telephone.

## 8.0 Wireless Policy

Media Village recognises that there are risks associated with users accessing and handling information in order to conduct official business.

This policy aims to mitigate the following risks:

- Appropriate risks relevant to the policy - e.g. the non-reporting of information security incidents, inadequate destruction of data, the loss of direct control of user access to information systems and facilities, etc.

## 9.0 Contacting Media Village

If you have any questions about this privacy policy or personal information that the Media Village holds please direct your enquiries as follows:

- by email to [info@media-village.co.uk](mailto:info@media-village.co.uk)
- by post to Data Security, Media Village, Media House, Burnley Road, Altham, Accrington, BB5 5TX.

If you have a concern about Media Village's information rights practices, you should report it to the ICO by accessing by either emailing [casework@ico.org.uk](mailto:casework@ico.org.uk) or accessing their web site [www.ico.org.uk](http://www.ico.org.uk).

Complaints relating to breaches of the General Data Protection Regulations and/or complaints that an individual's personal information is not being processed in line with the 8 principles of data protection will be managed and processed at Board Level. All complaints of dissatisfaction will also be processed with the highest priority.

