

# Data Protection Policy



CLASSIFICATION: INTERNAL

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## 1. Definitions and Acronyms

### Definitions

Term	Explanation
Information Asset	Anything that has value to the Organization and is either a form of information itself or creates, stores, transmits, or manages information.
Information Security	Preservation of Confidentiality, Integrity and Availability; in addition, other properties such as authenticity, accountability, non-repudiation and reliability can also be involved
GDPR	General Data Protection Regulation
Writer Relocations Employee	Person hired to perform a job or service for the SBU - Writer Relocations of Writer Business Services Pvt. Ltd., and one who is directly employed or hired on a contract basis
Customers	All the clients of the organization who avail services or products provided by the Writer Relocations.
Third parties	All third parties which includes, but is not limited to vendors, related government authorities, shipping line, airline, partners, volunteers, contractors, consultants, temporaries, and others who have access to, support, administer, manage, or maintain Writer Relocation's information or physical assets
Data Protection Officer (DPO)	A data protection officer (DPO) is an enterprise security leadership role required by the General Data Protection Regulation (GDPR). Data protection officers are responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements.
Data Protection	Data protection is the process of protecting data and involves the relationship between the collection and dissemination of data and technology, the public perception and expectation of privacy and the political and legal underpinnings surrounding that data. It aims to strike a balance between individual privacy rights while still allowing data to be used for business purposes. Data protection is also known as data privacy or information privacy.
Data Breach	A data breach is a confirmed incident in which sensitive, confidential or otherwise protected data has been accessed and/or disclosed in an unauthorized fashion. Data breaches may involve personal health information (PHI), personally identifiable information (PII), trade secrets or intellectual property
Data Processor	The entity that processes data on behalf of the Data Controller
Data Controller	The entity that determines the purposes, conditions and means of the processing of personal data
Data Subject	A natural person whose personal data is processed by a controller or processor
Consent	Freely given, specific, informed and explicit consent by statement or action signifying agreement to the processing of their personal data

### Acronyms

Acronym	Full Name
DPO	Data Protection Officer
GDPR	General Data Protection Regulation
CISO	Chief Information Security Officer
DC	Data Controllers

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Acronym	Full Name
DP	Data Processors
DS	Data Subject
BCR	Binding Corporate Rules

## **2. Introduction**

The SBU - Writer Relocations of Writer Business Services Pvt. Ltd. needs to collect and use information of individuals as part of their service delivery. This personal information must be collected and dealt with appropriately whether is collected on paper, through websites, applications and stored in a computer database, or recorded on other material and safeguards to ensure this under the General Data Protection Regulation.

## **3. Scope**

This policy applies to all personal data the SBU - Writer Relocations process regardless of the location where that personal data is stored and regardless of the data subject

## **4. Data Processor and Data Controller**

The SBU - Writer Relocations is the data processor as well as a data controller as per the General Data Protection Regulation.

## **5. Disclosure**

The Individual/Service User will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows Writer Relocations to disclose data (including sensitive data) without the data subject's consent.

These are:

- a) Carrying out a legal duty
- b) Protecting vital interests of an Individual/Service User or other person
- c) The Individual/Service User has already made the information public
- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- e) Monitoring for equal opportunities purposes – i.e. race, disability or religion
- f) Providing a confidential service where the Individual/Service User's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where Writer Relocations would wish to avoid forcing stressed or ill Individuals/Service Users to provide consent signatures.

Writer Relocations regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom Writer Relocations deal.

Writer Relocations intends to ensure that personal information is treated lawfully and correctly.

To this end, Writer Relocations will adhere to the Principles of Data Protection, as detailed in the General Data Protection Regulation.

Specifically, the below Principles requirements shall be fulfilled:

- a) Lawful, Fair and Transparent processing
- b) Purpose Limitation (specified purposes)
- c) Data Minimization (adequate, relevant and limited)
- d) Accurate and Up-to-date processing
- e) Limitation of storage in a form that permits identification
- f) Confidential and Secure – protects integrity and privacy
- g) Accountability and Liability – demonstration of compliance

Writer Relocations will, through appropriate management and strict application of criteria and controls:

- a) Observe fully conditions regarding the fair collection and use of information
- b) Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- c) Ensure the quality of information used
- d) Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
  - The right to be informed that processing is being undertaken;
  - The right of access to one's personal information;
  - The right to prevent processing in certain circumstances; and
  - The right to correct, rectify, block or erase information which is regarded as wrong information)
- e) Take appropriate technical and organizational security measures to safeguard personal information
- f) Process data of people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information

## 6. Data Collection

Informed consent is when:

- An Individual/Service User clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

Writer Relocations will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected by completing an online form.

When collecting data, Writer Relocations will ensure that the Individual/Service User:

- a) Clearly understands why the information is needed
- b) Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
- c) As far as reasonably possible, grants explicit consent, in writing (though online form) for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on how data will be used

## **7. Data Storage**

Information and records relating to service users will be stored securely and will only be accessible to authorized staff only after written consent is provided.

Information will be stored for only as long as it is needed or required statute and will be disposed-off appropriately.

Writer Relocations will take appropriate measures to ensure secure disposal of the information upon receiving request for disposal or after the purpose for which the data collected is over or after the retention period.

Physical copies of the personal data will be shredded and notification to the data subject will be sent.

It is Writer Relocations responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organization, which has been passed on/sold to a third party.

## **8. Data access and accuracy**

Writer Relocations will take reasonable steps ensure that this information is kept up to date by asking controllers whether there have been any changes in the information provided by the data subject.

In addition, Writer Relocations will ensure that:

- a) It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection Regulation
- b) Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- c) Everyone processing personal information is appropriately trained to do so



- d) Everyone processing personal information is appropriately supervised
- e) Anybody wanting to make enquiries about handling personal information knows what to do
- f) It deals promptly and courteously with any enquiries about handling personal information
- g) It describes clearly how it handles personal information
- h) It will regularly review and audit the ways it stores, manage and use personal information
- i) It regularly assesses and evaluates its methods and performance in relation to handling personal information
- j) All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

## **9. Data Breach Response**

- a) Writer Relocations shall notify the respective data controller / data subjects / supervisory authority without undue delay after becoming aware of a personal data breach.
- b) Where, and in so far as, it is not possible to provide the information at the same time, the information may be provided in phases without undue further delay.

## **10. Enforcement**

This policy will be reviewed and updated at least once a year or as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the General Data Protection Regulation.