

Statement of Policy

SCB Partners is fully committed to compliance with the requirements of the Data Protection Act 1998 ('the Act'). The company will therefore follow procedures which aim to ensure that all employees, contractors, consultants, partners or agents of the company (collectively known as data users) who have access to any personal data held by or on behalf of the company are fully aware of and abide by their duties under the Act.

The company needs to collect and use information about people in order to operate and carry out its functions. This data may relate to members of the public, social media feeds and data supplied to us via our trusted business partners and clients. It may also include current, past and prospective employees, clients and customers and suppliers. This personal information must be handled responsibly as stated under the Act.

We consider that the correct treatment of personal data is integral to our successful operations and to maintaining trust of the persons we deal with. We fully appreciate the underlying principles of the Act and support and adhere to its provisions.

We are registered as a data controller with the Information Commissioner in accordance with section 19 of the Act.

SCB Partners will, through management and use of appropriate controls, monitoring and review:

- Use personal data in the most efficient and effective way to deliver our services.
- Strive to collect and process only the data or information which is needed.
- Use personal data for such purposes as are described at the point of collection, or for purposes which are legally permitted.
- Strive to ensure information is accurate.
- Not keep information for longer than is necessary.
- Securely destroy data which is no longer needed.
- Take appropriate technical and organisational security measures to safeguard information (including unauthorised or unlawful processing and accidental loss or damage of data).
- Ensure that information is not transferred abroad without suitable safeguards.
- Ensure that there is general information to the public of their rights to access information.
- Ensure that the rights of people about whom information is held can be fully exercised under the Data Protection Act 1998. These rights include:
 - The right to access their own personal information within 40 days of request
 - The right to prevent processing in certain circumstances
 - The right to correct, rectify, block or erase information regarded as wrong information
- Ensure that the company will have an officer specifically responsible for data protection.
- Provide guidance and training for data users at an appropriate level.
- Ensure that any breaches of this policy are dealt with appropriately.

The Principles of Data Protection

The Data Protection Act stipulates that anyone processing personal data must comply with 8 principles of good practice. These principles are legally enforceable.

Summarised, the principles require that personal data:

1. Shall be processed fairly and lawfully and in particular, shall not be processed unless specific conditions are met.
2. 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. Shall be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed.
4. Shall be accurate and where necessary, kept up to date.
5. Shall not be kept for longer than is necessary for that purpose or those purposes.
6. Shall be processed in accordance with the rights of data subjects under the Act.
7. Shall be kept secure, i.e. protected by an appropriate degree of security.
8. Shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

The Act provides conditions for the processing of any personal data. It also makes a distinction between personal data and 'sensitive' personal data.

Personal data is defined as data relating to a living individual who can be identified from:

- That data
- That data and other information which is in the possession of, or is likely to come into the possession of the data controller and includes an 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

Sensitive personal data is defined as personal data consisting of information as to:

- Racial or ethnic origin
- Political opinion
- Religious or other beliefs
- Trade union membership
- Physical or mental health or condition
- Sexual life
- Criminal proceedings or convictions

While it is unlikely, SCB Partners may be required to disclose user data by a court order or to comply with other legal requirements. We will use all reasonable endeavors to notify the user before we do so, unless we are legally restricted from doing so.

SCB Partners shall not sell, rent, distribute or otherwise make personal data commercially available to any third party, except as described above or with our Clients prior permission.