

Data Handling Policy

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Introduction:

The GDPR states written contracts between controllers and processors is a general requirement, these contracts must now include certain specific terms, as a minimum. These terms are designed to ensure that processing carried out by a processor meets all the requirements of the GDPR (not just those related to keeping personal data secure).

The GDPR gives processors responsibilities and liabilities in their own right, and processors as well as controllers may now be liable to pay damages or be subject to fines or other penalties.

Controllers must only use processors which are able to guarantee that they will meet the requirements of the GDPR and protect the rights of data subjects.

Controllers must provide documented instructions for the processor to follow. Controllers remain directly liable for compliance with all aspects of the GDPR, and for demonstrating that compliance.

Business Summary:

Get Ahead Virtually Ltd, is committed to protecting the personal data of its customers and suppliers and to ensuring its compliance with all relevant legislation.

Get Ahead Virtually offers the following services in a virtual/remote working condition on behalf of several companies/organisations:

- General Administration
- Social Media Management
- Newsletter Curation
- Travel Planning
- Marketing Strategy
- Graphic Design
- Phone Answering
- Meeting Minutes
- Email Sending
- Diary Management
- HR Administration

Get Ahead Virtually (GAV) is run, owned and managed by Eloise Howes. GAV doesn't currently subcontract any work to any third parties.

All work is carried out from a home office, or from a location that has been agreed with the client. This maybe a café, meeting room or the client office.

Data Collection from Clients:

We will not collect any information about you without your explicit consent. We collect information about your business to manage your account, like:

- Dealing with any requests you make or content you submit.
- Getting in touch if we need to tell you about something, like a change to our policies or issues with a service.
- Invoicing

The information I hold will consist only of:

- Contact Name
- Company Name
- Company Email
- Company Telephone
- Company Address

This data is only used for invoicing and is not used to market to, sell on to third parties.

This data is input into online cloud software: Harvest & Xero to allow for work time tracking and billing purposes only.

How long do we keep your data:

The data referenced above is kept in our online software accounts for our accounting purposes only.

Data Processing on behalf of clients:

We will store and process your data following industry best practice and security.

We will take all reasonable steps to ensure that there are appropriate arrangements in place that includes provisions covering the appropriate secure transfer, handling and processing of the personal information by those entities and third parties.

Required from the Data Controller (client):

The subject matter	
The nature and purpose of the processing	
The duration of the processing	
Written instructions of data to process*	
Specify who the data processors are	(can the processor use a sub processor?)

*If a processor determines the purpose and means of processing (rather than acting only on the instructions of the controller) then it will be considered to be a controller and will have the same liability as a controller.

Obligations and rights as the data controller (client):

- produce written instructions to the processor of what data to process
- ensure that people processing the data are subject to a duty of confidence
- take appropriate measures to ensure the security of processing

Obligations of the data processor (Get Ahead Virtually):

- only engage sub-processors with the prior consent of the controller and under a written contract**
- assist the controller in providing subject access and allowing data subjects to exercise their rights under the GDPR;
- assist the controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments;
- delete or return all personal data to the controller as requested at the end of the contract; and
- submit to audits and inspections, provide the controller with whatever information it needs to ensure that they are both meeting their Article 28 obligations, and tell the controller immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state.
- to co-operate with supervisory authorities (such as the ICO)
- to ensure the security of its processing
- to keep records of processing activities
- to notify any personal data breaches to the data controller

**If a processor uses a sub-processor then it will, as the original processor, remain directly liable to the controller for the performance of the sub-processor's obligations.

Data Management Process

Where we store our data:

GAV uses online third-party software systems that include:

Dropbox, Google Docs, Adobe Creative Cloud, Mailchimp, WordPress, Eventbrite, GoTo Webinar, Zapier, Hootsuite, Office 365

All these online software companies have their own GDPR policies.

How we secure our data:

GAV uses a Macintosh laptop with integrated security features.

Where we back-up our data:

All cloud documents are backup and have online encryption

How we transport:

The transportation of any data, whether that is electronically or via manual notepad method will be taken seriously. No transport mediums will be left unattended at any stage.

How we dispose:

GAV will either permanently delete data, from its online cloud storage completely or shred physical documentation and a standard practice.

End of contract process:

If the contract comes to an end, we will return ALL data that we were required to file or store on behalf of the client (data controller).

Note: This is intended to provide an overview of GDPR and is not a definitive statement of the law. For a definitive guide, check out the [Information Commissioner's Office website](#).