TRUE

DATA PROTECTION POLICY

Policy Statement

True Staging Ltd (True Staging', 'we', 'us', and 'our') is committed to fully complying with all the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (together referred to in this policy as 'Data Protection Law').

Scope

This data protection policy explains how we will comply with our responsibilities and obligations under Data Protection Law and applies to:

- All personal data whose use is controlled by us, whether kept on paper, digitally or
- electronically (i.e. Computers)
- Our staff, suppliers, contractors and sub-contractors
- NB: This policy should be read and used in conjunction with our other following policies
- Privacy
- Retention
- Privacy & Cookies

Objective

The objective of this policy is to:

- Ensure we follow the principles of personal data
- Ensure personal data is processed in a consistent manner throughout the organisation at all times
- Clarify responsibilities for implementing, complying and monitoring this policy
- Give guidance to our staff, suppliers, contractors and sub-contractors about how to identify and minimise the risks of breaching the GDPR as well as the possible consequences of doing so

Definitions

Personal data means any information relating to an identified or identifiable person ('data subject') such as a name, postal/email address or an identification number. Examples of personal data typically processed by us are:

- First and last names
- Postal and email addresses
- Telephone numbers
- Dates of Birth
- Identity documents (e.g. passports & driving licence)
- Identity numbers (e.g. National Insurance and Bank accounts)

Special categories of personal data means personal data revealing racial or ethnic origin,

political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and data concerning criminal convictions or offences.

Examples of special category personal data typically processed by us are:

- Health & medical information (including whether a person has a disability)
- Info. about ethnic origin & race
- Staff sickness records

Data subject means any individual whose personal data is processed by us. Examples of our data subjects are:

- Clients
- Staff
- Staff next of kin
- Job applicants
- Suppliers of goods & services
- Contractors
- Sub-Contractors
- Contacts

Processing means any use of personal data such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, dissemination, erasure and destruction.

NB: This means that virtually anything we do with personal data will be processing. Data controller means the organisation which decides the purposes and means of the processing of personal data

NB: True Staging is the data controller for the purposes of this policy.
Data processor means an individual or organisation that processes personal data on behalf of a data controller. Examples of our data processors are:

- External payroll
- External IT support

Personal data breach means a breach of security leading to the accidental, or unlawful, destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Consent means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data. Staff means anyone working at or for us including:

- Directors
- Permanent, interim and temporary employees
- Interns

Principles of data protection

Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation')
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
4. Accurate and, where necessary, kept up to date ('accuracy')
5. Kept for no longer than is necessary ('storage limitation')
6. 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 ('integrity and confidentiality')

Roles and responsibilities

Our directors have ultimate responsibility for ensuring compliance with Data Protection Law, the principles of data protection and this policy.

Jennifer Angus has the following responsibilities:

- Briefing True Staging about its data protection responsibilities
- Reviewing this and related policies
- Advising other staff about data protection issues
- Ensuring that data protection induction and training takes place
- Notification to the ICO
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data
- Approving contracts with data processors

Jennifer Angus can be contacted at: **jennifer@truestaging.co.uk**.

All staff, suppliers, contractors and sub-contractors have a responsibility to comply with Data Protection Law, the principles of data protection and this policy when carrying out their duties.

Line managers are responsible for supporting staff's adherence with this policy. All suppliers, contractors and sub-contractors have a responsibility to comply with Data Protection Law, the principles of data protection and this policy when carrying out their contractual and statutory obligations to us. Failure to comply with this policy may result in legal and/or disciplinary action.

Rights

Data subjects' have the right to:

1. **Be informed** about the collection and use of their personal data.
2. **Access** their personal data
3. **Rectification** of inaccurate personal data
4. **Erasure** (deletion) of their personal data (also known as the 'right to be forgotten) *
5. **Restrict processing** of their personal data*
6. **Data portability** - to easily move, copy or transfer their personal data
7. **Object** to
    7.1. processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)

7.2. direct marketing (including profiling); and
7.3. processing for purposes of scientific/historical research and statistics
8. **Appropriate decision-making** in relation to automated decision making and profiling
*This is not an absolute right and only applies in certain circumstances

Subject Access Requests

Any data subject may make a Subject Access Request, ('SAR'). Anyone member of staff, supplier, contractor or sub-contractor in receipt of a SAR must pass it on to Jennifer Angus as soon as possible as a matter of urgency.

Security

All staff and data processors are responsible for ensuring that any personal data which we are responsible for is kept securely. Examples of keeping personal data secure are:

- Paper files/records should be kept in locked cabinets when not in use
- Monitors/computer screens should be visible only to those who need to see them
- Paper files/records should not be removed from our business premises without
- appropriate authorisation
- Desks should be cleared when not in use
- Personal data no longer required for day-to-day use should be sent to secure archiving

Disclosure (sharing)

This includes the disclosure (sharing) of personal data by:

- Staff with other teams /departments and
- Staff with third parties/other organisations (including out data processors)
- Our data processors to third parties.

Personal data must not be disclosed unless the recipient is authorised to have access to that personal data and then only in accordance with Data Protection Law.

Examples of unauthorised recipients are:

- Family members
- Friends

Staff, suppliers, contractors and sub-contractors should exercise great caution when asked to disclose personal data and if in doubt should seek advice from Jennifer Angus before doing so. All decisions to disclose personal data must be recorded and all such disclosures must be specifically authorised by Jennifer Angus.

Retention

Personal data must not be kept for any longer than is necessary and only in accordance with this policy. Personal data is stored for 7 years unless it is deemed as active

Disposal (deletion/destruction)

When it is no longer necessary to keep it, personal data must be disposed of securely. This means that:

- Paper will be shredded on site, or disposed of externally as confidential waste
- Computer equipment will be disposed of securely by specialist contractors
- A register will be maintained to record details of the media and computer equipment
- that has been disposed of, when it was disposed, how it was disposed and by whom

Transfer outside the EEA

Data Protection Law generally prohibits the transfer (sending) of personal data outside the European Economic Area (EEA) unless:

- An 'adequacy decision' has been made for the destination country; or
- The transfer is subject to appropriate safeguards; or
- A 'derogation' can be relied upon, e.g. –
    - Where it is necessary for the conclusion or performance of a contract that we
    - have with the data subject or another person, or

    - It is in our legitimate interests (this will only be available to and used by us in
    - very limited circumstances)

    - With the data subject's explicit consent (this can only be available to and used
    - by us in very limited circumstances)

These restrictions mean that personal data cannot be freely transferred outside the EEA and that it will be a breach of Data Protection Law to do so unless any such transfer can be made in accordance with the above.

All decisions to transfer personal data outside the EEA must be specifically authorised by Jennifer Angus.

Data protection Impact assessments

A data protection impact assessment (DPIA) is a process to help identify and minimise the data protection risks of a project.

Data Protection Law includes an obligation to conduct a DPIA for types of processing likely to result in a high risk to individuals' interests and is good practice for any major new project which requires the processing of personal data.

Any circumstances where a DPIA may be required should not be undertaken without the approval of Jennifer Angus.

Marketing

The rules about sending marketing messages mean, in summary, that we should not contact individuals without being satisfied that they do not object to hearing from us and that by contacting them we are not being a nuisance to them.

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PRIVACY POLICY

Why you should read this policy

We ask that you read this Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This policy shall apply to clients, prospective clients and website visitors only. For employees and Sub-Contractors, please speak to your line manager or email info@truestaging.co.uk to request the most recent copy of our privacy policy.

Who we are

http://www.truestaging.co.uk (Website) is operated by True Staging Limited. We are a specialist creative construction business, incorporated and registered in England and Wales under company number 06582320, whose registered office address is at 130 Shaftesbury Avenue, 2nd Floor, London W1D 5EU.

True Staging ('We' or 'us') collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018. We are responsible as 'controller' of that personal information for the purposes of those laws.

Our collection and use of your personal information

Information that you provide

We collect personal information about you when you SEND FEEDBACK, CONTACT US FOR ANY REASON AND BY ANY MEDIUM, SIGN UP TO A SERVICE, SHARE INFORMATION VIA THE WEBSITE'S SOCIAL MEDIA FUNCTIONS, OR REPORT A PROBLEM WITH THE WEBSITE.

We collect this personal information from you either directly, such as when you contact us via our Website or indirectly, such as your browsing activity while on our Website (see 'Cookies' below).

We collect data that is specifically and voluntarily provided by a visitor to our Website. In most circumstances, this data includes limited identifiable information. Where we store any information collected via our Website we will ensure that it is adequately protected.

We may ask you to provide sensitive personal data from time to time which may include data relating to health conditions. If such data is requested, you will be given additional information as to why the sensitive personal data is being requested and how it will be used, often this will be required to provide you with our services.

We may retain a record of any contact you make with us.

The personal information we collect about you depends on the particular activities carried out through our Website. Such information includes:

- your name, address, email address and contact number;
- details of any feedback you give us by phone, email, post or via social media; and

- information about the services we provide to you.

Personal information about other individuals
If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her data;
- receive on his/her behalf any data protection notices;
- give consent to any transfer of his/her data.

Information from third parties
Occasionally we may receive information about you from other sources, which will be added to the information already held about you in order for us to help supply our services and products to you.
Information that will be collected automatically

Cookies: We may monitor your use of the Website through the use of cookies and similar tracking devices. For example, we may monitor how many times you use the Website, which pages you go and traffic data. This information helps to build a profile of users to the Website. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. For further information on the use of cookies on the Website, please see the sections on cookies below.

How your personal data will be used. We use this personal information to:

- create and manage your account with us;
- verify your identity;
- enquire for further information;
- provide our services to you;
- administration;
- fraud prevention and detection;
- customise our Website and its content to your particular preferences;
- notify you of any changes to our Website or to our services that may affect you;
- improve our services.

Our legal basis for processing your personal information
When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why. The legal bases we may rely on include:

- consent: where you have given us clear consent for us to process your personal information for a specific purpose;
- contract: where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract;
- legal obligation: where our use of your personal information is necessary for us to comply with the law (not including contractual obligations);
- legitimate interests: where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

We may use your personal information for a variety of lawful purposes related to the services we provide. The lawful basis for such processing is set out below:

Why we use your data

- To perform our contract with you
    - To provide you with our services.
    - To verify your identity.
    - To deal with your enquiry.
    - To ensure the information we hold about you is up to date

- To comply with legal obligations
    - To verify your identity
    - To detect and prevent fraud.
    - Management purposes such as accounting or auditing.
    - To ensure the information we hold about you is up to date

- To pursue legitimate interests
    - To verify your identity.
    - To deal with your enquiry.
    - To make improvements to services we provide.
    - To let you know about important changes to our policies.
    - Management purposes such as accounting or auditing.
    - To renew and improve your experience on our website
    - For advertising and marketing purposes

Disclosure of your personal data

We may disclose your personal data to:

- other companies that become partners or part of a group with True Staging;
- a third party who acquires True Staging or acquires substantially all of its assets, in which case the personal data shall be one of the acquired assets;
- our agents and service providers;
- law enforcement and regulatory agencies in connection with any investigation to help prevent unlawful activity or as otherwise required by applicable law;

Our Website does not collect or compile personally identifying information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

Transfer of your information out of the EEA

Your personal information may be transferred to third party service providers who process information on True Staging's behalf, including providers of information technology, identity management, Website hosting and management, data analysis, data back-up, security and storage purposes. As a result, your personal data may be transferred outside of the country where you are located, including outside of the European Economic Area **(EEA).** Where we use data servers that may transfer data out of the EEA we will take steps to ensure adequate protections are in place to ensure the security of your information and give you remedies in the unlikely event of a security breach.

Please note that we review all processors we utilise and ensure that there are adequate safeguards in place to protect your personal data, such as adherence to binding corporate rules or compliance with the **EU-US Privacy Shield Framework**, which is a mechanism that ensures compliance with EU data protection requirements when transferring personal data from the European Union to the United States. You can learn more about Privacy Shield here: https://www.privacyshield.gov/welcome

If you would like further information regarding the transfer of your information out of the EEA please contact our Data Protection Officer using the details provided in the 'How to contact us' section below.

Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access the Website. We use cookies and other online tracking devices on the Website to:

- recognise you whenever you visit the Website;
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve the Website content, products and services and to help us better understand our visitor and customer requirements and interests; and
- make your online experience more efficient and enjoyable.

The information we obtain from the use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally. In certain circumstances we may collect personal information about you, but only where you voluntarily provide it (eg by completing an online form).

In most cases we will need your consent in order to use cookies on this Website. The exception is where the cookie is essential in order for us to provide you with a service you have requested.

Description of cookies

The cookies that we utilise on our Website are placed to fulfil such functions as allowing visitors to share content with a range of networking and sharing platforms, analysing how you use the Website and giving you a better more personalised experience. Our Website uses the following cookies:

- **Session cookies** expire at the end of your browser session and allow us to link your actions
- during that particular browser session.
- **Persistent cookies** are stored on your device in between browser sessions, allowing us to
- remember your preferences or actions across multiple sites.

Some of the cookies we utilise on our Website include:

Cookie Name	Cookie Description
_ga	Definition: Used to distinguish users Source: Google Analytics Duration: 2 years
_gid	Definition: Used to distinguish users Source: Google Analytics Duration: 24 hours
_gat	Definition: Used to throttle request rate Source: Google Analytics Duration: 1 minute

How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not

accepted. If you do this, please be aware that you may lose some of the functionality of the Website. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org.

Marketing

If you have provided your consent to receive news, special offers or promotions from us, we may contact you by MAIL, TELEPHONE AND EMAIL, about our PRODUCTS, SERVICES, PROMOTIONS, SPECIAL OFFERS AND CHARITABLE CAUSES that may be of interest to you. The Website may contain links to other websites or apps which we or our partners own, or websites or apps of our partners or third parties. Please note that if you follow any of these links, the websites, apps and services provided through them will have their own privacy policies/terms of use. We do not accept any responsibility or liability for their respective privacy policies/terms of use or the collection and use of any personal data collected through these websites, apps or services. Please ensure that you review the relevant privacy policies/terms of use prior to providing any personal data to, or using these websites, apps and services.

Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of QUALITY ASSURANCE, TRAINING, FRAUD PREVENTION AND COMPLIANCE.

Your Rights

We will collect and store information about you, as detailed above. You will be provided with opportunities to consent to this Privacy Policy and marketing when you provide your personal details to us. You can change your mind or remove or add your consent at any time.

- You have the right of access to your personal records or other information that we hold about you. There is no administrative charge for this service.
- You have the right to rectify any errors in the data we hold about you. If any data or information we hold about you is inaccurate, or out of date, please contact us and we will correct this immediately.
- You may have the right to have the data we hold about you erased.
- If you wish us to continue to store your information but wish us to keep your data separate and not process it in any way, please let us know.
- You have the right to ask us to stop processing your personal data for direct marketing purposes. You may also specify that you object to direct marketing by particular channels such as by email of telephone. If this is the case, please
- specify the channels you are objecting to in your communications with us.
- You have the right to data portability. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in a CSV file. There is no administrative charge for this service.

To revise your consent, access, amend or remove your records or assert any of your rights set out above, you should send your request in writing to us at info@truestaging.co.uk
You may need to provide proof of identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, amended or removed.

How long we will store your data

We will store your data for as long as necessary for the purpose of processing. The data may be deleted in the following circumstances:

- you have withdrawn your consent to data processing;

- the original purpose for processing the data is no longer relevant or cannot be
- performed any more;
- the data is no longer up to date or accurate; or
- where we no longer have a reason to store your data as determined by our Data Retention Policy.

Children

We do not contract directly with children and therefore, we do not actively process the personal data of children. In using our services, you confirm that you have read and consented to this Policy and verify that you are over the age of 18.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also confirm that your data will be stored on secure servers.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Concerns and Questions

We hope that we can resolve any query or concern you raise about our use of your information. The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns/ or telephone: 0303 123 1113.

Changes to this Privacy Policy

We may change this Policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version that will apply each time you use the Website.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to info@truestaging.co.uk, write to True Staging, Radford Business Centre, Radford Way, Billericay CM12 0BZor call 01277 658 735.

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Data Protection Policy

Introduction	
Purpose of policy	• Complying with the law • Following good practice • Protecting clients, staff and other individuals • Protecting the organisation
Types of data	Personal records of employees and sub-contractors Necessary and relevant to carry out the business with the individual or company: • Name & Address • Telephone numbers • Email addresses • Bank details • Date of Birth • Next of Kin • National insurance / PAYE details Client data includes: • Name & Address • Telephone number • Email addresses • Bank details • Records of past projects • • Records of payment history
Policy statement	Comply with both the law and good practice • Respect individuals' rights • Be open and honest with individuals whose data is held • Provide training and support for staff who handle personal data, so that they can act confidently and consistently
Key risks	We aim to constantly manage and maintain data flow within True Staging Ltd. Staff holding personal information will constantly be monitored in terms of company policy and updated and trained in changes in data laws

Responsibilities	
The Board / Company Directors	Directors have overall responsibility for ensuring that the organisation complies with its legal obligations
Data Protection Officer	Jennifer Angus Responsibilities include: • Briefing the team on Data Protection responsibilities • Reviewing Data Protection and related policies • Advising other staff on tricky Data Protection issues • Ensuring that Data Protection induction and training takes place • Notification to the ICO • Handling subject access requests

	• Approving unusual or controversial disclosures of personal data • • Approving contracts with Data Processors
Employees	All staff should be required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work. (From now on, where 'employees' is used, this includes both paid employees and volunteers.)

Security	
Setting security levels	We take appropriate technical and organisational security measures to prevent unauthorised access and to ensure that the personal data we hold as Data Processor is kept secure. All information you provide to us is stored on our secure servers. Any electronic payment transactions will be encrypted and conducted by our third-party payment providers in accordance with their terms.

Data recording and storage	
Retention periods	Hard copy information is stored for 7 years unless it is deemed as active We retain your personal information for as long as is necessary to provide the services to you and others, and to comply with our legal obligations. If you no longer want us to use your personal information or to provide you with True Staging Ltd's services, you can request that we erase your personal information and close your account. Please note that if you request the erasure of your personal information we will retain information from deleted accounts as necessary for our legitimate business interests, to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce the terms of service and take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy.
Archiving	Digital archives on secure servers Hard copy archiving with secure filing procedures

Rights of Access	
Responsibility	Employees, Suppliers & Clients are all invited to request the level of information stored from our Data Protection Officer. This information should be requested by email to jennifer@truestaging.co.uk

	Any requests will be handled within the legal time limit which is one month
Provision for verifying identity	Where the person managing the access procedure does not know the individual personally, there should be provision for checking their identity before handing over any information

Transparency	
Commitment	True Staging Ltd are committed to ensuring that individuals and companies are aware that their data is being processed • For what purpose it is being processed • What types of disclosure are likely, and • • How to exercise their rights in relation to the data
Procedure	Memo • Email footer • Handbook • Letter of offer • • Website

Opting out/Withdrawing	
Opting out / Withdrawing consent	True Staging are open to the individual or company requesting certain information not to be stored. Any requests should be made via email to our Data Security Officer where feedback of the consequences will be made clear

Employee training & Acceptance of responsibilities	
Induction	All employees have been made aware of the changes in Data Protection laws. The company is committed to keeping all involved in the data chain updated on policy. Key positions including Directors to continually monitor personal data security All employees who have access to any kind of personal data should have their responsibilities outlined during their induction procedures

Signature: J.Angus

Position: Data Protection Officer