

# Voice Beyond Data Protection policy

## Overview

### Key details

- Policy prepared by: Raf Jezierski
- Approved by Board/committee on: 23<sup>rd</sup> May 2018
- Next review date: 23<sup>rd</sup> May 2019

### Introduction

In order to operate, Voice Beyond needs to gather, store and use certain forms of information about individuals.

These can include employees, contractors, suppliers, marketing audiences, business contacts and other people the group has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet Voice Beyond data protection standards and comply with the General Data Protection Regulations (GDPR).

### Why is this policy important?

This policy ensures that Voice Beyond:

- Protects the rights of our contacts and customers
- Complies with data protection law and follows good practice
- Protect the group from the risks of a data breach

## Roles and responsibilities

Who and what does this policy apply to?

This applies to *all* those handling data on behalf of Voice Beyond e.g.:

- Committee members
- Employees
- Contractors/3<sup>rd</sup>-party suppliers

It applies to all data that Voice Beyond holds relating to contacts and customers, which enables the subject to be identified including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other company information held (e.g. warehouse performance)

## **Roles and responsibilities**

Voice Beyond is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer for Voice Beyond is Mark Batchelour. They, together with the Voice Beyond committee, are responsible for the secure, fair and transparent collection and use of data by Voice Beyond. Any questions relating to the collection or use of data should be directed to the Data Protection Officer.

*Everyone* who has access to data as part of Voice Beyond has a responsibility to ensure that they adhere to this policy.

Voice Beyond has used third party Data Processors (e.g. Mail Chimp) to process data on its behalf. Voice Beyond will ensure all Data Processors are compliant with GDPR.

## **Data protection principles**

### **a) We fairly and lawfully process personal data in a transparent way**

Voice Beyond will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A contact, prospective customer or customers, name and contact details will be collected when contact is first made with Voice Beyond, and will be used to contact the contact or customer regarding follow up activities including business planning and contractual obligations. Other data may also subsequently be collected in relation to their business, including business performance characteristics. Voice Beyond will keep secure and where possible will anonymise this data
  - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Voice Beyond completing tasks expected as part of the contacts proposed relationship.
- The name and contact details of employees and contractors will be collected when they take up a position, and will be used to contact them regarding group administration related to their role.

Further information, including personal financial information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person).

- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Voice Beyond completing tasks expected as part of working with the individuals),
- Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the Voice Beyond website' below.
  - Lawful basis for processing this data: Consent (see 'How we get consent')

**b) We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.**

When collecting data, Voice Beyond will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

**c) We ensure any data collected is relevant and not excessive**

Voice Beyond will not collect or store more data than the minimum information required for its intended purpose.

**d) We ensure data is accurate and up-to-date**

Voice Beyond will ask contacts, staff and contractors to check and update their data on an annual basis. Any individual will be able to update their data at any point by contacting the Data Protection Officer.

**e) We ensure data is not kept longer than necessary**

Voice Beyond will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records).

The storage and intended use of data will be reviewed in line with Voice Beyond's data retention policy. When the intended use is no longer applicable (e.g. contact details for an individual or company no longer interested in dealing with Voice Beyond), the data will be deleted within a reasonable period.

**f) We keep personal data secure**

Voice Beyond will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position

- Physically-held data (e.g. warehouse performance characteristics) will be stored in a locked cupboard
- Keys for locks securing physical data files should be collected by the Data Protection Officer from any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position
- Access to data will only be given to relevant committee members/contractors where it is clearly necessary for the running of the group. The Data Protection Officer will decide in what situations this is applicable and will keep a master list of who has access to data

### **g) Transfer to countries outside the EEA**

Voice Beyond will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.

## **Individual Rights**

When Voice Beyond collects, holds and uses an individual's personal data that individual has the following the rights over that data. Voice Beyond will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

### **Individual's rights**

- *Right to be informed:* whenever Voice Beyond collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- *Right of access:* individuals can request to see the data Voice Beyond holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months
- *Right to rectification:* individuals and company contacts can request that their data be updated where it is inaccurate or incomplete. Voice Beyond will request that staff and contractors check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.
- *Right to object:* individuals can object to their data being used for a particular purpose. Voice Beyond will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- *Right to erasure:* individuals can request for all data held on them to be deleted. Voice Beyond data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request unless:

- There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
- There is a legal requirement to keep the data.

*Right to restrict processing:* individuals can request that their personal data be ‘restricted’ – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, Voice Beyond will restrict the data while it is verified).

Though unlikely to apply to the data processed by Voice Beyond, we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

## How we get consent

Voice Beyond will from time to time collect data from consenting contacts, prospects and customers for marketing purposes. This includes contacting them for industry opinions, quotations and/or endorsements for marketing collaterals, and other group activities.

Any time data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a ‘tick box’)
- A clear and specific explanation of what the data will be used for (e.g. ‘Tick this box if you would like Voice Beyond to send you email updates with details about our products and promotional activities and opportunities to get involved’)

Data collected will only ever be used in the way described and consented to (e.g. we will not use email data in order to market 3rd-party products unless this has been explicitly consented to).

Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an ‘unsubscribe’ link in an email). Opt-out requests such as this will be processed within 14 days.

## Cookies on the Voice Beyond website

A cookie is a small text file that is downloaded onto ‘terminal equipment’ (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user’s device and store some information about the user’s preferences or past actions.

Voice Beyond uses cookies on our website ([www.voicebeyond.com](http://www.voicebeyond.com)) in order to monitor and record their activity. This allows us to improve users’ experience of our website by, for example, allowing for a ‘logged in’ state, and by giving us useful insight into how users as a whole are engaging with the website.

We will implement a pop-up box on ([www.voicebeyond.com](http://www.voicebeyond.com)) that will activate each new time a user visits the website. This will allow them to click to consent (or not) to continuing with cookies enabled, or to ignore the message and continue browsing (i.e. give their implied consent).

It will also include a link to our Privacy Policy which outlines which specific cookies are used and how cookies can be disabled in the most common browsers.

# Data retention policy

## Overview

### Introduction

This policy sets out how Voice Beyond will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

It forms part of Voice Beyond Data Protection Policy.

### Roles and responsibilities

Voice Beyond is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for Voice Beyond is Mark Batchelour. They, together with the committee are responsible for the secure and fair retention and use of data by Voice Beyond. Any questions relating to data retention or use of data should be directed to the Data Protection Officer.

## Regular Data Review

A regular review of all data will take place to establish if Voice Beyond still has good reason to keep and use the data held at the time of the review.

As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review. The first review will take place on 1 July 2018.

### Data to be reviewed

- Voice Beyond stores data on digital documents (e.g. spreadsheets) stored on personal devices held by group members.
- Data stored on third party online services (e.g. Google Drive, Salesforce, Mail Chimp)
- Physical data stored at the homes of group members

## Who the review will be conducted by

The review will be conducted by the Data Protection Officer with other group committee members to be decided on at the time of the review.

## How data will be deleted

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally.
  - Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
  - Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

## Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data. This consent could be implied by previous use and engagement by the individual	Continue to use	Get consent
Can the data be anonymised	Anonymise data	Continue to use

## Statutory Requirements

Date stored by Voice Beyond may be retained based in statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Details of payments made and received (e.g. in bank statements and accounting records)
- Contracts and agreements with suppliers/customers
- Insurance details
- Tax and employment records

## Other data retention procedures

### Member data

- When a contact or customer leaves Voice Beyond and all administrative tasks relating to their contact or contractual have been completed any potentially sensitive data held on them will be deleted – this might include bank details or company related data
- Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two year review

### Mailing list data

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible.
- All other data will be stored safely and securely and reviewed as part of the next two year review

### Contractor and partner data

- When a contractor or partner stops working with Voice Beyond and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted – this might include bank details or company related data
- Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two year review

### Other data

- All other data will be included in a regular two year review.