

# Data Protection Policy Compliance with GDPR

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## Introduction

WiT Partnership is a small management development/organisational development and change consultancy. We take seriously our obligations to limit the amount of personal data that we hold and to keep it safe.

Data Controllers: John Mitchell/ Lesley Cramman

## Personal Data we hold

As controllers of data we hold and process two main types of personal data in the course of our normal work:

1. Contact details of clients, suppliers and other people and organisations with whom we work
2. Research data arising from our work on learning histories and other evaluations

The table below sets out information about how and why we process this data

	CONTACT INFORMATION	RESEARCH
Type of Data	Work contacts – email address, phone number, work address	Interview audio recordings, interview transcripts, names and some personal information
Lawful basis for processing data	Legitimate interests	Consent
How we get the data	Personal contact and exchange of information	Interviews and workshops

	CONTACT INFORMATION	RESEARCH
Why we have it	To enable communication about our work and work projects	To undertake research and produce research reports commissioned by our clients
Where we hold it	In Contacts synced across password protected PC and phone	On password protected PC and synced to password protected cloud storage (Microsoft)
How long we hold it	As needed for carrying out current and potential future work	During the research process and up to a year beyond the publication of the research report
Data Sharing	Contact details are only shared with the explicit consent of the individual concerned	None of the research data is shared, and participants are assured anonymity in published reports
Special categories	N/A	Personal data will sometimes include protected characteristics, age, position in organisation. This data is not shared, and is only ever used in reports in aggregated form
How we inform people of their personal rights	Reference to our privacy notice on our website if requested	Basic information on the consent form, and link to privacy notice on our website

## Rights of individuals whose data we hold

All individuals whose data we hold have the following rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restriction of processing
- The right to data portability
- The right to object

To exercise any of these rights, in the first instance contact [john.mitchell@wit-uk.com](mailto:john.mitchell@wit-uk.com)

Individuals also have the right to complain to the Information Commissioner's Office if concerned about how we handle their data.

## Data Breaches

We take care to secure our data in secure ways that will limit the possibility of a data breach.

Our PC, laptop and mobile devices are password protected. Cloud storage is password protected. We run anti-virus and malware software (Norton 365) on our PC and laptop. All potentially sensitive hard copy documents are shredded by an approved contractor complying with all current standards and codes of practice (Shredall)

In the event of a data breach we would take the following action:

If the breach is likely to result in damage to a person's reputation, financial loss, loss of confidentiality, or major financial or social disadvantage, we would notify the ICO.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, we would contact them directly without undue delay.