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# Quality Management System Data Protection Policy PU 110

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The signatures below certify that this document has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

|             | Signature   | Position          | Date       |
|-------------|---|-------------------|------------|
| Reviewed by |  | Office Manager    | 01/06/2020 |
| Approved by |  | MANAGING DIRECTOR | 01/06/2020 |

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# Data Protection Policy

## Statement

It is the aim of Prima Uno Ltd, our employees, stakeholders and consultants, that all persons whose personal data is processed by Prima Uno Ltd shall at all times be confident that their privacy is respected, and that due care is taken regarding their personal data.

Personal details shall be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and where necessary, kept up to date – inaccurate data to be erased or rectified without delay
- Kept in a form which permits identification of data subjects of no longer than is necessary for the purposes for which the personal data is processed
- 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.

Prima Uno have a dedicated data processor. Only staff required to undertake the processing or monitoring, or auditing have access to the personal data and only undertake processing on instructions from Prima Uno.

## 1 General

Prima Uno Limited (registration number 07000818) are the data controllers for the processing carried out by us or on our behalf. This means that we determine the purpose of and means for the processing of your personal data, i.e. why and how we process the data.

Prima Uno Ltd will comply with all data protection laws incorporated into UK law that control the collection and use of data relating to individuals (“personal data”) as well as with this privacy policy. The purpose of this privacy policy is to set out the principles governing the use of personal data you give to us, or we obtain about you.

Prima Uno have an internal breach notification procedure and an internal breach register.

This privacy policy will be revised regularly, and any subsequent changes will be published on our website in this area. This version of the privacy policy was last reviewed during April 2018.

## 2 Data we may collect from you

Personal data, including data such as names and addresses which you provide to Prima Uno, may be processed manually as well as by computers.

Personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and where necessary kept up to date – inaccurate data to be erased or rectified without delay
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed
- 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 organisations measures.

### 2.1 Visitors to our website

An IP address is a unique number which makes it possible to identify a user's connection to the Internet and it is automatically provided by your web browser each time you view a website. Any visit to the Prima Uno Ltd website may lead to registration of the IP address used for such access. We also use IP addresses to measure the use of Prima Uno Ltd webpages. Such measurement may include:

- Monitoring/collecting information as to how you use the site to help Prima Uno Ltd to improve the site
- to personalise your experience by tailoring the content you see
- to optimise your user experience
- to determine frequency of use
- to perform statistical analysis of data collected.

### 2.2 Use of Cookies

This site may use "cookies," which are small data files stored on your computer or another computer for use with your web browser software. Cookies are used on this site to provide the

user with access to functions available on the site such as registering for updates, requesting information and submitting enquiries. If you would like information about cookies and on how to restrict or block cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

By accepting the Terms of Use as well as by accessing and using the website, you consent to the use of the above stated cookies. You may also consent to our use of cookies by the settings you have made in your web browser. If you do not wish to accept our use of cookies, you must then exit this website or disable the function for cookies in your web browser software. Please note that without cookies, the functionality of the site may be impaired.

Random checks will be carried out to ensure ongoing confidentiality, integrity, availability and resilience of our systems and processes.

### 2.3 Other stakeholders

Other stakeholders include job applicants, former employees, and third parties, as well as individuals contacting Prima Uno Ltd via social media.

Any personal data collected from other stakeholders will be processed in line with this policy, and the purpose it was originally collected for, and held securely. Please see section 3.

Examples of personal data held for other stakeholders are:

Name / Contact details.

Individuals who submit an interest in working at Prima Uno Ltd will have additional data stored, such as which role they are interested in, to fulfil their request to register such an interest.

As per the General Data Protection Regulation (GDPR), data collected must not be kept for longer than it is required. The personal data we collect about other stakeholders will be deleted when no longer required, unless there is a lawful basis to process particular data, or consent has been received to store the data. We will review the data we have on an annual basis. The deletion of data will be done in a secure and controlled manner.

## 3 How we use your data

Your personal data will only be used for the purposes indicated when you submit the data, or to fulfil our legal obligations, or as detailed (below) under this privacy policy. Should we need to process your data for a new purpose we will contact you prior to the processing activity.

We may use personal information in the following ways:

- To ensure efficiencies and monitor use of our website
- To administer any request from you
- To administer any actions needed regarding any agreements with you
- Marketing and customer follow-up
- Sales/product development, all as determined and applicable by Prima Uno. By submitting personal data, you agree and consent to be bound by the terms outlined in this Privacy Policy and in the Terms of Use.
- To comply with regulatory requirements
- For business analysis

Personal data will be securely stored on our servers. Should there be a need to disclose your data elsewhere we will do so after checking the security measures in place. See section 4.

This privacy notice does not cover any links that may be posted within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## 4 Disclosure of your data

Prima Uno Ltd may provide your personal data to third parties such as a partner in order to fulfil the purpose for which they were collected. The data provided by you might be exported to other parties of Prima Uno Ltd and/or business partners located in countries within, or outside of, the European Union and the European Economic Area.

Where data needs to be exported outside of Prima Uno Ltd, and the European Economic Area, suitable contracts will be drawn up to maintain a level of security equivalent to the GDPR of the data.

## 5 User Submissions

Prima Uno Ltd may allow you to post information, comments or other material on our site, social media networks or other online services. Please note the terms of use for such are set out in our **Legal Notice**.

Do not provide us with information about other persons unless you can prove that you have their consent to provide it.

Please exercise caution when submitting personal data online. It is your responsibility to maintain the security of your passwords and personal information. Your usage of this website constitutes an acknowledgement and assumption of these risks.

## 6 Your rights

Prima Uno Ltd strives to be as open and transparent as possible regarding what personal information we hold on you and how we process that data. If you wish to further understand what data we hold on you, or request personal data be corrected or deleted, you can do so using the contact details below. We will comply with your request within 1 calendar month.

You have the right to ask us not to process your personal data for marketing purposes. Please see section 7.

You also have the right to submit a complaint to the relevant supervisory authority if you find that your personal data is being processed in violation of applicable data protection legislation.

## 7 Training and awareness

All staff are trained at induction and regularly thereafter (minimum once a year) on data protection to help demonstrate compliance.

Training is undertaken for all staff both at induction and as annual training and includes:

- The principles relating to data protection
- What is personal data
- Known scams
- How to report a potential breach
- The requirement to use and use of appropriate security, technical and organisational measures
- Internal breach notification procedure
- How to identify an access request and who to refer it to.

## 8 How to Contact us

If you have any questions regarding Prima Uno Ltd's privacy policy, or wish to contact us regarding access to and correction of your Personal Data, you are welcome to contact us using the email address below:

*Email:* [info@primauno.co.uk](mailto:info@primauno.co.uk)

or by submitting form available on our website: <https://primauno.co.uk/contact/>