

Data Protection Policy Statement

Carter Jonas is fully committed to compliance with the requirements of the Data Protection Act 1998. Our procedures aim to ensure that all Partners and employees, or anyone working on behalf of the Firm, who have access to any personal data held by or on behalf of the Firm are fully aware of and abide by the obligations arising under the Act.

1. Statement of Policy

Carter Jonas needs to collect and use information about people with whom it works in order to operate and carry out its functions. These will include clients, prospective clients, past and prospective employees and suppliers. We understand that this personal information must be handled and dealt with properly however it is collected, recorded and used and whether it is on paper, in computer records or recorded by other means. We regard the lawful and appropriate handling of personal information as a priority and fully endorse and adhere to the Principles of the Data Protection Act 1998.

2. The eight principles

The Data Protection Act stipulates that anyone processing personal data must comply with 8 principles of good practice. These principles are legally enforceable.

In summary these principles require that personal data shall:

1. be processed fairly and lawfully
2. be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes
3. be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed
4. be accurate and where necessary, kept up to date
5. not be kept for longer than is necessary for that purpose or those purposes
6. be processed in accordance with the rights of data subjects under the Act
7. be kept secure, i.e. protected by an appropriate degree of security
8. not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection

3. What is personal or sensitive data

The Act provides conditions for the processing of any personal data. It also makes a distinction between personal data and 'sensitive' personal data.

Personal data is defined as data relating to a living individual who can be identified from:

- That data
- Or that data and other information which is in the possession of, or is likely to come into the possession of the data controller and includes an expression of opinion about the individual and any indication of the intentions of the data controller, or any other person in respect of the individual.

Sensitive personal data is defined as personal data consisting of information as to:

- Racial or ethnic origin
- Political opinion
- Religious or other beliefs

- Trade union membership
- Physical or mental health or condition
- Sexual life
- Criminal proceedings or convictions

4. The management of personal and sensitive data

Carter Jonas has detailed procedures in place to ensure that personal and sensitive data is appropriately managed. These procedures are subject to regular monitoring and review. Additionally the Firm provides all staff with regular training to ensure that everyone is aware of their obligations and the importance of this matter.

As a Firm we will endeavor to ensure that we:

- Only collect and process data or information which is essential.
- Use personal data for such purposes as are described at the point of collection, or for purposes which are legally permitted.
- Information held by us is accurate and is kept up to date.
- Retain information only for as long as necessary and we will securely destroy data which is no longer needed.
- Take appropriate technical and organisational security measures to safeguard information (including unauthorised or unlawful processing and accidental loss or damage of data.
- Not transfer or share data without suitable safeguards.

5. Sharing of data

Carter Jonas does not make the data it holds available to third parties unless that entity is providing a service for us in which case we will remain as the data controller and will take full responsibility for the security and appropriate handling of the data.

6. Access to the data held by us or raising a concern

Under the Data Protection Act 1998 people about whom information is held can:

- Access their own personal information – you can expect a response within 40 days of a request.
- Prevent processing in certain circumstances.
- Correct, rectify, block or erase information regarded as wrong information.

All such requests or any concern regarding the data we hold should be submitted in writing to:

- the Data Protection Officer at 51 Northbrook Street, Newbury. RG14 1DT.

Or by

- email to compliance@carterjonas.co.uk.