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TITLE:	DATA PROTECTION POLICY			

INTRODUCTION

Neuven Group needs to collect personal information about people with whom it deals in order to carry out its' business and provide its' services. Such people include employees (present, past and prospective), clients, suppliers, any other business contacts and any third party associated with any of the aforementioned. The information includes name, address, email address, date of birth, payroll information, right to work and equality information, the latter which is deemed sensitive. In addition, we may occasionally be required to collect and use certain types of such personal information to comply with the requirements of the law i.e. driving licence information to ensure one is legally allowed to enable travel for company business.

We are the Data Controller for our own employees' personal data, and we also are the Data Processor of our clients and supplier employees' personal data. We process this personal data to meet our statutory and contractual obligations and to provide our clients with their services.

No matter how it is collected, recorded and used (e.g. on a computer or on paper) this personal information must be dealt with properly to ensure compliance with the General Data Protection Regulations (GDPR).

The lawful and proper treatment of personal information is extremely important to the success of our business and in order to maintain the confidence of our service users and employers.

Neuven fully supports and complies with GDPR and the following policy states the roles, responsibilities and processes that we have in place to ensure this compliance is maintained.

SCOPE

- All our employees are within the scope of this policy.
- Any client or clients' client employees, supplier or sub-contractor or anyone affected by our work activities also fall under the scope of this document.

POLICY


ROLES AND RESPONSIBILITIES

Company responsibilities

The Chief Executive has overall accountability for the compliance to all current and applicable legislation including GDPR. The Chief Financial Officer is the nominated Data Protection Officer and has the responsibility of advising and implementing policy, processes and procedures to ensure Neuven has continued compliance to GDPR.

The company will provide:-

- Training for employees who handle personal information
- Clear lines of report and supervision for compliance with data protection

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- Regular checks (at least twice per annum) to monitor and assess new processing of personal data
- A Privacy Impact Assessment (PIA) will be carried out on all stored personal data, and where personal data may be foreseeable accessed, needed or transferred
- The Chief Technology Officer will ensure that our website has a copy of our privacy notice
- A secure IT platform in which all personal data is stored

The company will ensure that all personal data is only processed in line with the lawfulness of processing conditions, i.e.:

- With consent of the data subject and / or necessary for the;
- Compliance with a legal obligation
- Performance of a contract with the data subject
- Performance of a task carried out in the public interest
- Purposes of Neuve's legitimate business interests

Employee Responsibilities


All employees will, through appropriate training and responsible management:

- Observe all forms of guidance, codes of practice and procedures about the collection and use of personal information
- Understand fully the purposes for which Neuve uses personal information
- Collect and process appropriate information, and only in accordance with the purposes for which it is to be used by Neuve to meet its service needs or legal requirements
- Ensure the information is correctly input into Neuve's systems
- Ensure the information is destroyed (in accordance with the provision of the Act) when it is no longer required
- On receipt of a request from an individual for information held about them by or on behalf of, immediately notify their line manager
- Not send any personal information outside of the United Kingdom without appropriate authorisation
- Understand that breaches of this Policy may result in disciplinary action, up to and including dismissal

Distribution and Implementation Plan

This document will be made available to all employees affected by this policy via the Chief Financial Officer.

A training needs analysis will be undertaken with employees affected by this policy. Based on the findings of that analysis appropriate training will be provided for employees as necessary.

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Monitoring

Compliance with this policy will be monitored via a regular audit.

The Chief Financial Officer is responsible for the monitoring, revision and updating of this document on a three yearly basis or sooner if the need arises.

Equality Impact

This document forms part of Neuvan’s commitment to create a positive culture of respect for all employees and service users. The intention is to identify, remove or minimise discriminatory practice in relation to the protected characteristics (race, disability, gender, sexual orientation, age, religious or other belief, marriage and civil partnership, gender reassignment and pregnancy and maternity), as well as to promote positive practice and value the diversity of all individuals and communities.

Associated Documents

The following documents will provide additional information:

- Registration with the Information Commissioners Office – Certificate.
- IT, Communications and Monitoring Policy
- Confidentiality letters

Data Loss Prevention (DLP) and Four Eyes Rule

At Neuvan, we are committed to maintaining high standards of information security, governance, and accountability. To support these objectives, we are implementing the "Four Eyes" principle (also known as the "4 Eyes Rule") for all external emails containing attachments.


The Four Eyes principle is a widely recognised security and compliance measure that requires certain actions or decisions to be reviewed or approved by at least two individuals before being finalised. Its purpose is to:

- Enhance accountability
- Minimise the risk of error
- Prevent unauthorised disclosure or fraud
- Ensure compliance with internal controls

Scope and Procedure

As part of this policy, all external emails that include attachments will be subject to managerial review before they are sent. The process is as follows:

- When a user sends an external email with an attachment, it will be automatically forwarded to their line manager for review and approval.

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- The line manager is responsible for:
 - Verifying the accuracy and appropriateness of the intended recipients listed in the **To**, **Cc**, and **Bcc** fields.
 - Confirming that the attachment is suitable, necessary, and appropriate for external distribution.

This process applies to **all Neuve users** when sending emails **externally with attachments**. Internal emails are excluded from this approval process.

Compliance

Failure to adhere to this procedure may result in disciplinary action, in accordance with the Company's Disciplinary Policy.