



Data Protection Policy – Phoenix Professional Services

Phoenix Professional Services is committed to conducting its business in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct.

This policy details expected behaviours of Phoenix Professional Services's Employees and Third Parties in relation to the collection, use, retention, transfer, disclosure and destruction of any Personal Data belonging to a Phoenix Professional Services's Customers and Staff (i.e. the Data Subject) and irrespective of the media used to store the information.

Personal Data is any information (including opinions and intentions) which relates to an identified or Identifiable Natural Person. Personal Data is subject to certain legal safeguards and other regulations, which impose restrictions on how organisations may process Personal Data.

An organisation that handles personal data and makes decisions about its use is known as a Data Controller. Phoenix Professional Services, as a Data Controller, is responsible for ensuring compliance with the Data Protection requirements outlined in this policy.

Non-compliance may expose Phoenix Professional Services to complaints, regulatory action, fines and/or reputational damage.

Phoenix Professional Services's leadership is fully committed to ensuring continued and effective implementation of this policy and expects all Phoenix Professional Services Employees and Third Parties to share in this commitment.

Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction.

This policy document is reviewed on an annual basis.

Data protection principles

The Organisation is committed to processing data in accordance with its responsibilities under the DPA.

DPA requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the DPA in order to safeguard the rights and freedoms of individuals; and
- f. 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.”

What data is covered by this policy?

This policy covers all information relating to clients and their personal contact details previous employment history. These details are stored securely in cloud storage facilities provided by Microsoft.

Purpose Limitations

Data is held for the purposes of being able to provide the searches that are required to find and evaluate candidates on behalf of Phoenix’s clients., as well as to comply with UK law in terms of financial records retention.

Storage Limitations

Data will be stored for whichever is the longer:

- i. To be able to provide the services that Phoenix Professional Services provide, effectively and efficiently
- ii. To comply with UK Law and financial record retention

Integrity and Confidentiality

All data is store in password protected systems in cloud-based systems. All cloud-based data is protected by multi-factor authentication. Access to personal data shall be limited to personnel who need access.

Breach Reporting

If there is a breach in our data security, all affected clients will be notified immediately. If appropriate the breach shall be reported to the ICO.

Disclosure

To request what information we hold, or to request the removal of some or all data that we hold on you as an individual, please email us at gdpr@phoenixps.com.