



COBCOE POLICY

Policy Statement – Data Protection

It is a legal requirement for COBCOE to comply with UK Data Protection legislation (i.e. the Data Protection Act 1998 and the Data Protection Bill 2018).

It is also policy to ensure that every employee maintains the confidentiality of any personal data held by the organisation in whatever form.

COBCOE is registered for data protection in accordance with UK data protection legislation and requirements.

Data protection principles

The organisation keeps certain information (including personal data) about its employees, members, partners and suppliers for financial and commercial reasons and to enable us to monitor performance, to ensure legal compliance and for health and safety purposes.

To comply with the law, information is collected and used fairly, stored safely and not disclosed to any other person unlawfully.

COBCOE complies with the Data Protection Principles set out by UK data protection legislation and in accordance with this COBOCE is required to ensure that personal data is:

- obtained fairly and lawfully and shall not be processed unless certain conditions are met;
- obtained for specified and lawful purposes and not further processed in a manner incompatible with that purpose;
- adequate, relevant and not excessive;
- accurate and up to date;
- kept for no longer than necessary;
- processed in accordance with data subjects' rights;
- protected by appropriate security;
- not transferred to a country outside the European Union without adequate protection

In addition to these principles, COBCOE will also:

- Ensure a security mechanism based on least access, ensuring that COBCOE have the minimum access required to perform their role
- Ensure that business processes and computer systems incorporate data privacy and data security by design

To ensure the implementation of this policy COBCOE has designated the Chief Executive as the company's data protection coordinator. All enquiries relating to the holding of personal data should be referred to the Chief Executive in the first instance.



Policy Statement – Data Handling and security

COBCOE understands that the confidentiality, integrity, and availability of our members', partners', staff and other stakeholders' information are vital to our business operations and our own success.

We are committed to only employing the services of a specialist IT solutions services provider with the relevant expertise and accreditations and certifications to provide absolute services (ISO 9000 and ISO 27001 certified).

Such service providers will act as consultant and in-house support for IT infrastructure including full security systems as well as the providers of Cloud hosting facilities for data.

Our data is organised and stored in an efficient, professional and secure manner and every endeavour is made to ensure continuity and secure handling of personal and sensitive information.

The commitment to this policy is taken seriously by both Board members and staff alike and staff are fully trained and briefed in procedures and the requirements of this policy.

Policy Maintenance and Review

This policy will be reviewed on an annual basis (on or around the anniversary of its date of approval) to ensure that the policy maintains alignment with COBCOE's risk appetite, legal requirements and business practise.

This policy review and update was accepted by the COBCOE board and enacted as a formal policy on 3rd day of January of 2018.