

## Going-there Data Protection Policy

Going-there adheres to the data policies defined by the EU General Data Protection Regulation (GDPR). The purpose of the regulation is to protect the rights and privacy of individuals, and to ensure that data about them are not processed without their knowledge and are processed with their consent wherever possible. GDPR covers personal data relating to living individuals, and defines a category of sensitive personal data which are subject to more stringent conditions on their processing than other personal data.

GDPR covers data held in electronic formats, and also applies to manual data which are held in a relevant filing system.

Any personal data relating to an identifiable living individual which are held by Going-there in any form are covered by GDPR. Going-there is a data controller in respect of the data for which it is responsible. This means that Going-there is responsible under the GDPR for decisions in regard to the processing of personal data, including the decisions and actions of external data processors acting on Going-there's behalf. GDPR requires that processing should be carried out according to GDPR Principles. These are outlined below, together with Going-there's commitments to upholding these principles.

### Data Protection Principles

#### **(1) Personal data shall be processed fairly and lawfully.**

Going-there will ensure that data are obtained fairly, and will make reasonable efforts to ensure that data subjects are told who the data controller is, what the data will be used for, for how long the data will be kept and any third parties to whom the data will be disclosed. In order for processing to be fair and lawful, data which is not sensitive personal data will only be processed by Going-there if at least one of the following conditions, set down in GDPR, has been met:

1. The data subject has given his/her consent to the processing.
2. The processing is necessary for the performance of a contract with the data subject, or for taking steps with a view towards entering into a contract.
3. The processing is required under a legal obligation other than a contract.
4. The processing is necessary to protect the vital interests of the data subject.
5. The processing is necessary to pursue the legitimate interests of Going-there or of third parties, and does not prejudice the rights, freedoms or legitimate interests of the data subject.

Processing of sensitive personal data is subject to more stringent restrictions under GDPR. Processing of sensitive personal data will only be carried out by Going-there if at least one of the above conditions, applicable to non-sensitive data, has been met. In addition, at least one of the following conditions, set down in the Regulations, must also be met:

1. The data subject has given his/her explicit consent.
2. The processing is required by law in connection with employment.
3. The processing is necessary to protect the vital interests of the data subject or another person.
4. The information has been made public by the data subject.
5. The processing is necessary to trace equality of opportunity between people of different racial or ethnic backgrounds, different religious beliefs, or different states of physical or mental health or physical or mental conditions.
6. The processing is necessary for research purposes; provided that the processing will not support measures or decisions with regard to individuals, and will not cause substantial damage or distress to the data subject or any other person.

This list omits some conditions relating to the processing of sensitive personal data which are unlikely to be relevant to Going-there.

**(2) Personal data shall be obtained only for a specified and lawful purpose or purposes, and shall not be further processed in any manner incompatible with that purpose or purposes.**

Going-there will ensure that data which are obtained for a specified purpose are not used for a different purpose, unless that use is done with the consent of the data subject, or is otherwise permitted under General Data Protection Regulation.

**(3) Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.**

Going-there will not collect personal data which are not strictly necessary for the purpose or purposes for which they were obtained.

**(4) Personal data shall be accurate and, where necessary, kept up to date.**

Going-there will take reasonable steps to ensure the accuracy of personal data which it holds, and will take steps to correct inaccurate data when requested to do so by a data subject.

**(5) Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose.**

Going-there will ensure that personal data are not kept for longer than is required by the purpose or purposes for which the data were gathered. Going-there may retain certain data indefinitely for research purposes (including historical or statistical purposes), as permitted under GDPR, subject to the conditions laid down in the Act for this type of processing.

**(6) Personal data shall be processed in accordance with the rights of data subjects under the General Data Protection Regulation.**

Going-there will ensure that personal data are processed in accordance with the rights of data subjects under GDPR. These rights include the right to:

- Make subject access requests to find out what information is held about them, the purposes for which it will be used, and to whom it has been disclosed.
- Prevent the processing of data which is likely to cause them substantial damage or substantial distress.
- Prevent processing for the purposes of direct marketing.
- Be informed about automated decision making processes that affect them.
- Prevent significant decisions that affect them from being made solely by automated processes.
- Take action to require the rectification, blocking, erasure or destruction of inaccurate data.
- Request an assessment by the Information Commissioner of the legality of any processing that is occurring.

**(7) Appropriate technical and organisational measures shall be taken to prevent the unauthorised or unlawful processing of personal data and the accidental loss, destruction of or damage to personal data.**

Going-there will take steps to ensure the security of personal data which are held electronically and in manual form, to prevent the unauthorized disclosure of data to third parties, and loss or damage to data that may affect the interests of data subjects. Going-there will also ensure that data processors provide an appropriate level of security for the personal data which they are processing on Going-there's behalf.

**(8) Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.**

Going-there will not transfer data outside the European Economic Area unless the transfer would be permitted under GDPR.

UK law requires bodies which record and use personal information to register with the Information Commissioner. Going-there's registration details are included in the

Register of Data Controllers which is available on the website of the Information Commissioner. It records the purposes for which Going-there gathers personal data, the types of data subjects covered by each purpose, the classes of data gathered, recipients to whom the data will be disclosed, and countries or territories to which the data may be transferred. Any use by Going-there of personal data must be in accordance with the terms of Going-there's registration.

## Security of Data

GDPR requires that precautions should be taken against the physical loss or damage of personal data, and that access to and disclosure of personal data should be restricted. Members of Going-there who are responsible for processing personal data must ensure that personal data are kept securely, and that personal information is not disclosed orally or in writing, by accident or otherwise, to unauthorised third parties.

Information security is a large area, so the following recommendations are meant as general guidance only. They apply equally to all data processed off-site (e.g. by staff at home or on laptops), as to data processed on Going-there premises.

### Manual Data

- When not in use, files containing personal data will be kept in locked stores or cabinets to which only authorised staff have access.
- Files will be put away in secure storage at the end of the working day, and should not be left on desks overnight.

### Electronic Data

Members of Going-there using Information Technology (IT) and third-party partners processing data on Going-there's behalf are required to observe the following:

- Access privileges to personal data will be strictly monitored and be only insofar as access is required for delivery of a service.
- All personal data – both on internal Going-there Consultants and external clients – are kept securely and every reasonable measure is taken to prevent unlawful access or hacking into data.
- No sharing of data for commercial purposes shall occur.
- All third-parties working on Going-there's behalf must adhere to the same policy.

Care is taken to ensure that PCs and terminals on which personal data are processed are not visible to unauthorised persons, especially in public places. Screens on which personal data are displayed should not be left unattended if, for instance, Destination Consultants are working in the field. Transmitting personal details electronically is done

only secure Going-there email accounts or within secure Going-there administered systems (Gulliver, GT2go). Transmission of personal data by fax is generally avoided.

As well as preventing unauthorised access, it is equally important to avoid the accidental or premature destruction of personal data which could prejudice the interests of data subjects and of Going-there. To prevent this, data are regularly backed up.

Personal data in both manual and electronic formats should only be destroyed when any historical or statistical use is ended. Care is taken to ensure that appropriate security measures are in place for the disposal of personal data. Manual data is shredded or disposed of as confidential waste, while hard drives, disks and other media containing personal data are wiped clean (e.g. by reformatting, over-writing or degaussing) before disposal.

The General Data Protection Regulation lays particular obligations on data controllers to ensure that there are adequate safeguards for processing which is carried out on their behalf by data processors. Whenever personal data is to be processed by an external body acting on Going-there's behalf, Going-there:

- Chooses a data processor which provides sufficient guarantees in regard to its technical and organisational security measures;
- Takes reasonable steps to ensure that the data processor complies with these measures, and
- Ensures that the processing takes place under a written contract which stipulates that the processor will act only on instructions from Going-there, and that the processor will have security measures in place that ensure compliance with the General Data Protection Regulation.

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