



## DATA PROTECTION POLICY

**Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals;**

- Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Personal data processed must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Personal data shall be accurate and, where necessary, kept up to date;
- Personal data shall be 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 shall be 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.

The GDPR definition of "personal data" covers any information relating to an identified or identifiable natural person – i.e. living individuals. Pseudonymised personal data is covered, however anonymised or aggregated data is not regulated by the GDPR or DPA2018, providing the anonymisation or aggregation has not been done in a reversible way. Individuals can be identified by various means including their name and address, telephone number or Email address, NHS Number, NI Number.

The GDPR defines special categories of personal data (previously referred to as sensitive personal information) as information related to:

- Race or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health data
- Sexual history and/or sexual orientation
- Criminal data

### **Use of personal data**

Zenith Nurseries shall not process, transfer, modify, amend or alter the Personal Data or disclose or permit the disclosure of the Personal Data to any third party other than:

- as necessary to process Personal Data to provide payment for work



- as required to comply with Data Protection Laws or other laws to which Zenith Nurseries is subject
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### **Confidentiality and security**

Zenith Nurseries shall keep the Personal Data confidential and will ensure its staff and Sub processors are bound by the same confidentiality obligation. Zenith Nurseries shall implement appropriate technical and organisational measures to ensure a level of security of the Personal Data appropriate to the risk required pursuant to applicable Data Protection Laws and, where the Processing concerns personal data of EU residents, shall take all measures required pursuant to article 32 GDPR. In assessing the appropriate level of security, Zenith Nurseries shall take account in particular of the risks that are presented by Processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed.