



# **Dove Nest Group**

## **General Data Protection Regulation (GDPR) Policy**

## DOVE NEST GROUP POLICIES AND PROCEDURES

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Approved at full board meeting by

Signed:



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**Director Vince Hannant**

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# DOVE NEST GROUP POLICIES AND PROCEDURES

## Introduction

Dove Nest Management Training and Development Limited (hereafter referred to as Dove Nest), along with operating brands Psyence and Eat Sleep Work Retreat, are fully committed to compliance with the requirements of the General Data Protection Regulation (GDPR), in force as of 25<sup>th</sup> May 2018; The Privacy and Electronic Communications (EC Directive) Regulations, 2003; and the Freedom of Information Act 2003.

Dove Nest will therefore follow procedures to ensure that all employees, contractors, agents, consultants, or partners of Dove Nest who control or process any personal or sensitive data held on behalf any data subjects, are fully aware of and abide by their duties and responsibilities under the acts.

## Statement of Policy

To operate efficiently, Dove Nest is required to collect and use personal data about some people with whom it works. These may include (but not limited to) current, past and prospective employees, clients, customers, programme participants, and programme suppliers. The information is collected, handled and stored and processed in accordance with the new General Data Protection Regulations (GDPR, May 25<sup>th</sup> 2018).

As a designated Data Controller and Processor, Dove Nest regards the lawful, fair and transparent treatment of personal information as critical to its successful operations, and to maintaining confidence between Dove Nest and those with whom it carries out business. To this end, Dove Nest fully endorses and adheres to the principles of data protection as set out in the GDPR 2018.

Under the GDPR, personal data shall be:

- Collected for specified, explicit and legitimate purposes, and not processed in any manner incompatible with those purposes.
- Adequate, relevant and limited only to what is necessary in relation to the relevant purposes.
- Accurate, and where necessary, kept up to date.
- Kept in a form which permits identification of data subjects for no longer than necessary for the relevant purposes.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful access or process.

'Personal data' is defined as data relating to a data subject, who can be identified from that data or from other information which is in the possession of (or likely to come into the possession of) the data controller, and includes an expression of opinion about the individual and any indication of the intentions of the data controller, or any other person in respect of the individual.

'Sensitive personal data' is defined as personal data consisting of information as to:

- Racial or ethnic origin
- Political opinion

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- Religious or other beliefs
- Trade union membership
- Physical or mental health or condition
- Sexual life
- Criminal proceedings or convictions

All data subjects have the following rights (but which do not overwrite or nullify other legal obligations):

- To be informed of data collection/processing.
- To access their personal data and reuse for their own purposes.
- To rectify their data if inaccurate or incomplete.
- To have their data erased.
- To restrict processing of their data.
- To object to data processing.
- Rights in relations to automated decision-making.

In addition, Dove Nest will ensure that there is a designated Data Protection Officer and that every individual accessing, processing or controlling personal data understands their responsibilities under the GDPR and are appropriately supervised.

If a data subject wishes to exercise their rights regarding their data, they should submit a formal request to [enquiries@dovenest.co.uk](mailto:enquiries@dovenest.co.uk).

Furthermore, Dove Nest maintain, review and implement modern technical and organisational measures to ensure appropriate levels of security and to manage data access. Particular account has been taken of any risks presented by data processing. Security measures include the following:

- Secure cloud storage of personal data with access restricted only to the data subject and data controller/processor.
- Password protected personal devices never left unattended.
- Paper files secured in locked cabinets within private locked offices.
- Safe paper file disposal by shredding.
- Secure file transfer systems via cloud storage, or password protection.

### Lawful bases for data processing

Each form of data controlled, processed or stored by Dove Nest falls under one of the legal bases for processing as documented in the GDPR:

1. Data processing necessary for fulfilment of employment contracts.
2. Data processing necessary for compliance with UK and EU law.
3. Data processing necessary to protect someone's life and health.
4. Data processing in line with Dove Nest's legitimate business interests. Where this is applicable, a legitimate interests assessment has been conducted to ensure that processing is necessary to achieve the business interest, and the business interest has been balanced against the data subject's interests, rights and freedoms.
5. Where data processing does not fall under the above categories, clear and specific consent has been requested from the data subject along with a statement covering

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all uses of the data, and the data subject is also given a clear and simple method to withdraw consent at a later date.

Comprehensive details of the personal data stored by Dove Nest falling under each of these legal bases are available for audit. All personal data is available on the request of the data subject.

### Legitimate Interests Assessment

Data processed in accordance with Dove Nest Group's legitimate business interests include:

- Psychometric profile reports.
- Contact information for psychometric participants and 360 nominees.
- Psychometric portal login information.
- Data downloaded from Survey software for evaluation purposes.
- Personal contact details for course participants where required.
- CRM data for past, current and prospective clients, freelance workers, and self-catering bookings.
- Contact details for clients and participants where required.
- Any data controlled by, and shared by the client for our processing in accordance with mutual business interests.

In limited cases Dove Nest Group is required to process special category personal data including the following:

- Dietary information on catered residential events.
- Medical information on residential events including any physical activities.
- Dove Nest may also record certain sensitive information on employees and applicants for the purposes of monitoring and reporting on equality and diversity.

This additional information is given by the data subject with consent, and processed to protect the vital interests of the data subject and as a legal requirement.

Each respective type of data shall be kept for no longer than necessary for its purpose. Data subjects have the option to contact us in order to exercise any of their rights, including data deletion. Where this is the case, the subject must acknowledge that removing their data will affect their rights to future claims regarding that data.

### Obtaining Consent

Where consent is obtained as the basis for data processing, the following procedure is adhered to:

- Purpose of data processing is made clear to the data subject, along with information on where the data will be stored and for how long it will be retained.
- An opportunity for the data subject to provide consent will be clearly and explicitly given, and if this opportunity is not taken no data processing shall take place.
- At any time the data subject may inform us they wish to revoke consent, and upon revocation no further data processing shall take place.

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- Any contact of data subjects who have given consent shall include a clear opportunity to revoke consent, should they wish to do so.
- If the purpose, storage or retention of data processing changes, the data subject shall be informed of the change and offered a clear opportunity to revoke consent.

### Data Protection Officer

Dove Nest has appointed Vince Hannant as its Data Protection Officer. The DPO is responsible for:

- Implementation of the GDPR policy and ensuring employees are trained and compliant with the policy.
- Keeping the Board updated about data protection risks, issues and changes to legislation.
- Investigating any data breaches or violations of GDPR policy and reporting to the relevant people.
- Responding to queries from data processors and data subjects regarding GDPR policy.

### Notice to the Information Commissioner

The Information Commissioner maintains a public register of data controllers. Dove Nest is registered as such. The GDPR 2018 requires every data controller who is processing personal data, to notify and renew their notification, on an annual basis. Failure to do so is a criminal offence.

To this end the designated officers will be responsible for notifying and updating the Information Officer of the processing of personal data, within their directorate. The Information Officer will review the Data Protection Register annually, prior to notification to the Information Commissioner.

Any changes to the register must be notified to the Information Commissioner, within 28 days. To this end, any changes made between reviews will be brought to the attention of the Information Officer immediately.