

# Privacy Policy

Version 1.0 – April 2021

Mullion Guide is committed to processing data in accordance with its responsibilities under the GDPR.

## 1. Data protection principles

The GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals, and only to meet our operational needs;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those 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;
- 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 is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes subject to the implementation of the appropriate organisational measures required by the GDPR to safeguard the rights and freedoms of the data subject; 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.

## 2. General provisions

- a. This policy applies to all personal data processed by Mullion Guide.
- b. Personal data shall be processed in accordance with the rights of data subjects under the new General Data Protection Regulation.
- c. The Responsible Person shall take responsibility for the company's ongoing compliance with this policy.
- d. We shall ensure that all staff are made aware of good practice in data protection.
- e. This policy shall be reviewed every three years.
- f. We shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- g. We shall take reasonable steps to ensure personal data is accurate.
- h. Personal data processed shall not be kept for longer than is necessary for the purposes for which it was obtained.
- i. We are committed to ensuring that data subjects' rights can be appropriately exercised.

## 3. Security

- a. Mullion Guide will ensure that personal data is stored securely using modern software that is kept up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this shall be carried out safely to ensure that the data is irrecoverable.