

# **DATA PROTECTION POLICY**

# **1 Introduction**

## **1.1 Purpose of Policy**

Navan Road Nutrition needs to gather and use certain information about individuals.

These can include clients, suppliers and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data will be collected, handled and stored to comply with the General Data Protection Regulation.

## **1.2 Policy Statement**

Navan Road Nutrition is committed to a policy of protecting the rights and privacy of clients, and others in accordance with General Data Protection Regulation.

Navan Road Nutrition commits to:

- comply with both the law and good practice
- respect individuals' rights
- be open and honest with individuals whose data is held

## **1.3 Navan Road Nutrition**

Navan Road Nutrition may hold data for the following purposes:

- Provision of direct healthcare
- Case histories

Special categories of data included race, ethnic origin, health and sexual orientation.

Navan Road Nutrition may hold special category data for the following purposes:

- Provision of direct healthcare

## **1.4 Data Protection Principles**

Navan Road Nutrition will make every possible effort to comply with these principles at all times in our information-handling practices. The principles are:

### **1) Lawful, fair and transparent**

Data collection must be fair, for a legal purpose and we must be open and transparent as to how the data will be used.

### **2) Limited for its purpose**

Data can only be collected for a specific purpose.

### **3) Data minimisation**

Any data collected must be necessary and not excessive for its purpose.

### **4) Accurate**

The data we hold must be accurate and kept up to date.

### **5) Retention**

We cannot store data longer than necessary.

6) **Integrity and confidentiality**

The data we hold must be kept safe and secure.

## 1.5 Key risks

The main risks are in two key areas:

- information about individuals getting into the wrong hands, through poor security or inappropriate disclosure of information
- individuals being harmed through data being inaccurate or insufficient

## 2 Responsibilities

Navan Road Nutrition is the data controller for all personal data held by us and is responsible for:

- Analysing and documenting the type of personal data we hold
- Checking procedures to ensure they cover all the rights of the individual
- Identifying the lawful basis for processing data
- Ensuring consent procedures are lawful
- Storing data in safe and secure ways
- Assessing the risk that could be posed to individual rights and freedoms should data be compromised

## 3 Data Recording, Security and Storage

### 3.1 Data accuracy and relevance

Navan Road Nutrition will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

### 3.2 Data security

Navan Road Nutrition will keep personal data secure against loss or misuse.

Storing data securely

- In cases when data is stored on printed paper, it will be kept in a secure place where unauthorised personnel cannot access it
- Printed data will be shredded when it is no longer needed
- Data stored on a computer will be protected by strong passwords that are changed regularly. A password manager will be used to create and store passwords.
- All possible technical measures will be put in place to keep data secure

### **3.3 Data retention**

Navan Road Nutrition will retain personal data for no longer than is necessary. This shall be in accordance with the guidelines of our professional association, NTOI.

## **4 Accountability and Transparency**

Navan Road Nutrition will ensure accountability and transparency in all our use of personal data.

Navan Road Nutrition will ensure that consents are specific, informed and plain English such that individuals clearly understand why their information will be collected, who it will be shared with, and the possible consequences of them agreeing or refusing the proposed use of the data. Consents will be granular to provide choice as to which data will be collected and for what purpose. We will seek explicit consent wherever possible.

We will maintain an audit trail of consent by documenting details of consent received including who consented, when, how, what, if and when they withdraw consent.

We will regularly review consents and seek to refresh them regularly or if anything changes.

### **Subject Access Requests**

#### **4.1 What is a subject access request?**

An individual has the right to receive confirmation that their data is being processed, access to their personal data and supplementary information which means the information which should be provided in a privacy notice.

#### **4.2 How to deal with subject access requests**

Navan Road Nutrition will provide an individual with a copy of the information requested, free of charge. This will occur within one month of receipt.

If complying with the request is complex or numerous, the deadline can be extended by two months, but the individual will be informed within one month.

We can refuse to respond to certain requests, and can, in circumstances of the request being manifestly unfounded or excessive, charge a fee. If the request is for a large quantity of data, we can request the individual specify the information they are requesting.

Once a subject access request has been made, we will not change or amend any of the data that has been requested. Doing so is a criminal offence.

#### **4.3 Data portability requests**

We will provide the data requested in a structured readable format. We must provide this data to the individual who has requested it.

## **5 Transferring data internationally**

There are restrictions on international transfers of personal data. We will not transfer personal data abroad without express consent.

Navan Road Nutrition has a legal obligation to report any data breaches to Data Protection Commissioner.