



BLUE GNU CONSULTING LIMITED

Learning & Development Solutions and Independent Health Economics all under one roof

Blue Gnu Consulting Limited GDPR Policy

The overall aim of Blue Gnu Consulting Limited (known from this point on in the document as Blue Gnu) GDPR policy is to outline the company data guidelines, allow individuals to know what is happening to their personal data and to protect this data under the law.

1. The objectives of the policy are to:

- 1.1. Create and implement sufficient security measures to keep personal data protected. Blue Gnu do not manage or collect Sensitive Personal Data and therefore this is not covered in the policy
- 1.2. Outline how Blue Gnu stores data, for what purpose and for the length of time it will be stored – including the management of data quality
- 1.3. Provide an outline of clients' 'Right to be Forgotten' and what this involves
- 1.4. Identify the steps taken in the event of a security breach
- 1.5. Outline the areas of the GDPR law where Blue Gnu will be legally required to disclose information
- 1.6. Offer reassurance through regular reviews of this policy and client feedback on the our approach to Data Protection by Design

2. Data Protection Policy

It is the policy of Blue Gnu to:

- 2.1. Use password protected computers and/or encrypted USB sticks to store data.
- 2.2. Inform individuals that all Profiles from third party companies including Insights Discovery Profiles, and any other similar products profiling or diagnostic tools, *if* downloaded will be stored until the end of the client contract. Blue Gnu will only store the profiles for longer, with permission from the client. However, at present, it is not the policy of Blue Gnu to download and store copies of profiles locally, but to store them on cloud-based systems, which are password protected, with regular scheduled password changes.
- 2.3. Only use data for the purpose for which they were intended and that data will not be shared with third parties
- 2.4. Login information to any third-party portals will be changed every three months, ensuring that any mobile security breaches are minimised

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- 2.5. All bank account information is protected for the period of time necessary to ensure business transactions have been completed or until the business relationship has ended and then destroyed from all mobile devices and any associated Blue Gnu business systems. This includes work carried out on behalf of Blue Gnu on a contract basis by third party companies and individuals
 - 2.6. All appropriate Wi-Fi security measures are taken including such areas as WEP encrypted routers, with regular password updates scheduled
3. **Individual Rights.** Under the GDPR Legislation each contact has a number of rights, these are outlined fully on the Information Commissioners Office Website [Link to Individual Rights](#). Blue Gnu has prepared for these rights by:
- 3.1. Committing to ensure clients are aware of any changes to the way in which their data is being used
 - 3.2. Allowing Clients access to any data, which is stored about them or their employees in a way that it is convenient and transparent to them. This also includes their right to port any information held about them to take and use for themselves for different purposes
 - 3.3. Allowing Clients an easy way to have their personal data erased and forgotten from any systems used by Blue Gnu. This includes the right to have their anonymised data relating to them deleted, and excluded from statistics, profiling and forecasting
 - 3.4. Regularly reviewing the way in which we are using the personal or private details of our clients, ensuring that we are only collecting the right data and that it is absolutely necessary for the purpose for which it is being collected. However, we reserve the right to charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive and for the same purpose
 - 3.5. Information will be supplied within a month of request, and usually within 72 hours. For more complex requests it may be a further month is required. If we require 2 months, we will inform you as to the explicit reason for this extension of time.
 - 3.6. Blue Gnu does not use any automated profiling systems for marketing purposes, and therefore it is not included within this document
4. **Confidentiality, Integrity and Availability:** Blue Gnu does all it can to ensure the 'confidentiality, integrity and availability' of our systems and services and the personal data we process within them. However, In the event of a security breach e.g. theft of a computer, the loss of a laptop or a data grabbing malware, we will ensure:
- 4.1. The data can be accessed, altered, disclosed or deleted only by those you have authorised to do so (and that those people only act within the scope of the authority you give them)
 - 4.2. The data we hold is accurate and complete in relation to why you are processing it; and

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- 4.3. The data remains accessible and usable, i.e., if personal data is accidentally lost, altered or destroyed, we will take all necessary steps to recover it and therefore prevent any damage or distress to the individuals concerned.
 - 4.4. We will ensure a 'data security first' mind-set is used by Blue Gnu to minimise the risk of any breaches
 - 4.5. Blue Gnu will also carry out regular reviews of their security measures to ensure they are appropriate and effective, as well as any necessary Risk Assessments for unusual or large data requests
 - 4.6. Make sure access to data and premises is only given to those within the organisation, with the right level of responsibility and seniority. This includes access to the office premises even when set within a residential building
 - 4.7. When working off site, information is kept on encrypted devices and laptops are securely attached. Currently the only off-site working is carried out on clients' premises, to minimise the risk of any data breaches. Blue Gnu does not carry out work with data in any 'public areas'
 - 4.8. Hard copy personal information is shredded and disposed of in a secure manner
 - 4.9. Mobile devices are password protected and tracked, using Apps such as 'Find My Phone' and will be reported to the police should there be a theft inside or outside the office premises
 - 4.10. Any cloud computing systems such as Xero, Dropbox, Insights Online, iCloud and Accounting Systems have a password change every three months.
 - 4.11. In specific relation to Insights Discovery Profiles, and in accordance with Insights' specific Distributor Policy, personal profiles are shared only with the named person the profile relates to, unless with their express condition, it will not be shared with anyone else.
 - 4.12. Our website is currently hosted by wix.com and collects cookie data. Blue Gnu do not have access to the data that is collected by wix and do not use this data for any purposes, other than to enable a functioning website. A cookie alert is in place on the website.
5. **Legal Disclosure:** In certain specific circumstances, Blue Gnu will be legally required to disclose personal data. In these circumstances, the legal obligation overrides any objection the individuals may have
- 5.1. By or under any UK enactment;
 - 5.2. By any rule of common law; or
 - 5.3. By an order of a court or tribunal in any jurisdiction.
6. **Policy Reviews:** This policy will be reviewed on a regular basis:
- 6.1. During the first year of GDPR every three months;

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- 6.2. And after this period it will be reviewed annually;
- 6.3. If there is a significant change to the nature of the Blue Gnu business or work of a significantly different nature is carried on a 'one-off' basis, this policy will again be reviewed
- 6.4. The review will also consider
 - 6.4.1. A Data Protection by Design approach so as not to collect or hold on to unnecessary data
 - 6.4.2. A Data Impact Assessment to understand the full impact of collecting and holding the data and the level of risk associated with the activity.
7. If an approved code of conduct or certification scheme covering the training and development industry for which Blue Gnu processes data becomes available, we will consider working towards membership as a way of demonstrating that we comply.
8. Under Article 30 of the GDPR Blue Gnu will keep a record of any specific data processing activities.
9. The person responsible for GDPR is Elaine Gosden, Director of Blue Gnu Consulting Limited.

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