

Subcontractors Data Protection Procedure

PROTECTION OF PERSONAL DATA IS IMPORTANT TO VWA

“The more someone knows about us as individuals, the more power they can have over us. Personal data is used to make very important decisions in our lives. Personal data can be used to affect our reputations and it can be used to influence our decisions and shape our behaviour. In the wrong hands, personal data can be used to cause great harm.” Daniel J Solove, TeachPrivacy

At VWA, we are all responsible for ensuring the protection of any personal data that we come across in our workplace and to act if we become aware of an incident that could compromise an individual's personal data.

Data Protection Recap

What is 'personal data' in relation to VWA operations?

Personal data is any information that can be linked to an identified or identifiable individual.

In practical terms at VWA this can include:

- our clients' contact details including work email addresses
- marketing information, datasets of prospective clients or newsletter subscriptions
- Employee and candidate CVs
- employees' (current and former) data
- subcontractors' terms
- information gathered during audits or inspections that can lead to identifying an individual

What is a personal data breach?

There are 3 different types of data breaches categorised under the law.

These include both malicious acts or accidental disclosures.

1. Personal data access has been breached and is no longer guaranteed confidential
For example a cyber-attack or having a laptop stolen
2. The integrity of the data being compromised risking the accuracy and validity of the personal data. Data has been altered or changed.
For example having data altered through inaccurate or inappropriate data processing or malicious action.

3. Accidental loss of access to or destruction of data, which cannot be restored via back up procedures or just temporarily made unavailable.
For example a cyber-attack on 3rd party back up systems or VWA systems

Next Steps for Contractor Auditors

Be familiar with the VWA Personal Data Breach Management procedure noted below

Consider the possible data breach scenarios your business might come across and how you should react

Ensure Privacy issues and Data Protection checks are incorporated into all aspects of your operations including your services, the purchases you make, your risk assessments and business continuity plans

If you become aware of a potential breach immediately contact:

Alison Wheelock to initiate a full review

Email alison.wheelock@vwa.co.uk

Phone 01756 700802

Do not hesitate if you think there is a potential breach, as early intervention is key to mitigating the risk.