



THE GOOD SIDE PRIVACY NOTICE

Data processing, consent and GDPR policy

Updated on 11th May 2020

The Good Side respects and adheres to the principles relating to the processing of Personal Data found in the GDPR.

Consent:

Across all of our work, consent is required for certain types of information usage. When consent is required, we believe it must be freely given, specific, informed and unambiguous. Requests for consent will be separate from other terms, and be written in clear and plain language. The individuals consent will be 'explicit' where it relates to sensitive data.

More specifically The Good Side also aims to ensure that consent and privacy statements are:

- Clear, fair and not misleading
- Explain the consequences of providing the required information
- Explain how long the information will be kept for
- Explain if the replies to questions are mandatory or voluntary
- Explain if the information is to be anonymised and how
- (if relevant) explain if the information will be transferred overseas
- Explain that if the information will be shared, who with and how they will use it
- Explain how individuals may be contacted e.g. telephone, email, SMS, post
- Explain the individual's rights – e.g. they can obtain a copy of their personal information
- Explain who to contact if they wish to know more information about how their information is held or to opt-out of receiving further information or if they need to complain
- Explain the individuals' right to complain to the Information Commissioner's Office.

Data security:

- All personal data is stored in password-protected, encrypted and two-step verified cloud-based storage
- Our cloud-based storage provider uses subservice organisation data centres and managed service providers located in the United States.
- The storage provider complies with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, the European Economic Area, and Switzerland to the United States.



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- Our cloud-based storage provider uses subservice organisation data centres and managed service providers located in the United States. As such, a No Deal EU Exit will cause no change to access to and protection of all data.
- Files at rest are encrypted using 256-bit Advanced Encryption Standard (AES), password protection, and access is subject to two-step verification via mobile phone or email.
- Our cloud storage uses Secure Sockets Layer (SSL)/Transport Layer Security (TLS) to protect data in transit between computers and our servers.

Handling data breaches:

- All of our staff have been trained in knowing how to recognise and respond to data breaches. In the case of a data breach we escalate the issue to our data controller. Our data controller will then investigate the issue in detail and assess the risk to the individual (including emotional distress, physical or material damage). If necessary we will then inform the ICO, inform the participant and the FRC. This process will be completed within 72 hours of the breach being discovered.
- All research participants are granted the ability to leave the project, and for their personal data to be deleted, at any point. Participants are able to contact our data controller (James Lewis) at any time to request this action.
- Upon signing up for the project, participants are made aware that we will hold their data for 12 months before it is permanently deleted. They also receive details of how to contact our data controller for any requests regarding the exact data held and the process for requesting this data be amended or deleted. We commit to responding to any data change requests within four weeks (30 days).

GDPR specific policies:

In addition to the above, we also abide by the principles relating to processing of personal data in Article 5 of EU GDPR policy.

Lawfulness, fairness and transparency:

- The information we gather about an individual is collected in a way where they are fully informed how we intend to use that information, for what purposes and how we will share it
- A participant is able to ask for confirmation of the source of their personal information
- Personal information is not used in ways that would have adverse effects on individuals
- Participants are provided with easy to read and understand privacy notices when information is collected
- Third-party providers we work with must comply with the requirements of the General Data Protection Regulation
- Marketing undertaken by us is undertaken in a manner that complies with the General Data Protection Regulation

Purpose limitation:



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- We explain why we need the personal information we are collecting, and we do not use it other than for those purposes
- If there is a situation in which we want to share a person's contact details with a third party, we receive explicit consent from that individual before we do so

Data minimisation:

We only collect the information we need to provide the services required.

Accuracy:

- We take reasonable steps to ensure the accuracy of any personal information we obtain
- We ensure that the source of any personal information is clear
- We establish if an individual has challenged the accuracy of the information. And if this is the case, this is evaluated and recorded carefully
- We consider whether it is necessary to update the information, particularly if the purpose relies on the information being current.

Storage limitation:

- The Good Side does not keep personal data longer than is necessary for the purpose or purposes for which they were collected
- After twelve months of completing a project, all personal data is deleted. Unless we have received explicit consent from the individual to store this data for longer
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements
- In some circumstances we may anonymise personal information so that it can no longer be associated with individuals
- We also take all reasonable steps to destroy, or erase from its systems, all Personal Data which are no longer required

Integrity and confidentiality:

- We make sure that the personal information we hold is held securely to ensure that it does not become inadvertently available to other organisations or individuals

Accountability:

- We take full responsibility for complying with GDPR. We have also put in place a range of technical and organisational measures to meet and demonstrate that accountability. This includes:
- Adopting and implementing data protection policies
- Taking a 'data protection by design and default' approach
- Putting written contracts in place with our behalf
- Maintaining documentation of processing activities



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- Implementing appropriate security measures
- Recording and, where necessary, reporting personal data breaches
- Where relevant, carrying out data protection impact assessments for uses of personal data that are likely to result in high risk to individuals' interests
- Appointing a data controller (James Lewis)
- Adhering to relevant codes of conduct

The Good Side is the trading name of Saul Parker Consulting Ltd, a company registered in England and Wales with company number 09951203. VAT No. GB256 0871 94



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