

Introduction

NakedPR. based in Belfast, Northern Ireland is a public relations and communications agency. Under the GDPR (General Data Protection Regulation) we are required to outline how our company controls, processes, handles and protects your information while browsing or using this website. This includes your rights under current laws and regulations.

We want to assure you that we are committed to maintaining the trust and confidence of all those who visit our website and throughout this privacy policy, we will outline how we are going to ensure this continues to happen.

If you do not agree to the following policy, you may wish to cease viewing/using this website.

Processing of your personal data

From time to time, NakedPR. needs to collect and use certain types of information about the Individuals or Service Users who we come into contact with. This personal information will be collected and dealt with appropriately whether it is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the Data Protection Act 1998.

This personal information may be collected from:

- Information you give us directly
- Information collected automatically when you use the NakedPR. website
- Information we collect from other sources

Data Controller

NakedPR. is the data controller and will therefore determine what purposes personal information held, will be used. NakedPR. is also responsible for notifying the Information Commissioner's Office (ICO) of the data it holds or is likely to hold, and the general purposes that this data will be used for.

Disclosure

As policy, NakedPR. do not share any information held by the organisation with outside bodies unless there is a legal obligation to do so. This would include the following;

- a) Carrying out a legal duty or as authorised by the Secretary of State
- b) Protecting vital interests of an Individual/Service User or other person
- c) The Individual/Service User has already made the information public

- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights.

NakedPR. regards the lawful and correct treatment of personal information as very important to successful working and to maintaining the confidence of those with whom we deal.

NakedPR. intends to ensure that personal information is treated lawfully and correctly.

To this end, NakedPR. will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998.

Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- b) Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
- c) Shall be adequate, relevant and not excessive in relation to those purpose(s)
- d) Shall be accurate and, where necessary, kept up to date,
- e) Shall not be kept for longer than is necessary
- f) Shall be processed in accordance with the rights of data subjects under the Act,
- g) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- h) Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information.

NakedPR. will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used

- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken,
 - The right of access to one's personal information
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information (which is regarded as wrong information)
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information.

In this respect NakedPR. will respond to any request by first acknowledging the request within one week of receipt and will refer the matter to the Managing Director immediately. A full response to the request will be made within 21 days.

Informed consent is when

- An Individual/Service User clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

NakedPR. will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, NakedPR. will ensure that the Individual/Service User:

- a) Clearly understands why the information is needed

- b) Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
- c) As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used

Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is NakedPR.'s responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party and to this extent any hard-drives will be destroyed.

Data access and accuracy

All Individuals/Service Users have the right to access the information that NakedPR. holds about them. NakedPR. will also take reasonable steps to ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, NakedPR. will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do

- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will regularly review and audit the ways it holds, manages and uses personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

What happens if you don't provide us with your information?

You can enjoy our website without giving us your personal data or providing your consent. You can even enter only the minimal amount of information (name and contact information) if you wish. If you do not give us your data however, we most likely will not be able to communicate with you and provide you with our services.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

So that we're clear and there's no misunderstanding about how we handle your personal data, we will:

- Always keep your data safe and private.
- Never sell your data.
- Allow you to manage and review your marketing choices at any time.



In case of any queries or questions in relation to this policy please contact the Managing Director who performs the duty of Data Protection Officer.

Jackie Logan

NakedPR.

7 Donegall Square West

Belfast

BT6 1JH

Email: Jackie@naked-pr.com

Signed:

Position:

Date:

Review Date:



APPENDIX 1. DATA SECURITY ARRANGEMENTS

APPENDIX 2. INFORMATION INVENTORY.

APPENDIX 1.

Data Security Arrangements.

1. Computer held data.

Personal information relating to Individuals/Service Users is stored in NakedPR. cloud which is fully password protected. The password is known only to the Managing Director.

2. Manual data.

There is no paper based data.

APPENDIX 2 Inventory of Data Held by NakedPR.

1. Computer stored data

Data on NakedPR. Cloud	Policy
Names and addresses of companies/organisations who are clients of NakedPR.	None of this information will be shared without permission or legal requirement for NakedPR.to do so.
Email Addresses supplied by companies and organisations for communication purposes.	None of this information will be passed on or shared without permission.
Email addresses supplied by persons wishing to communicate by that means	None of this information will be passed on or shared without permission.
Contacts on mobile work phone	None of this information will be passed on or shared without permission

Paper Systems

Application Forms for employees/clients of (Company)	Policy
Application forms containing name of person applying for employment /	None of this information will be shared outside NakedPR.
Tender Information / Client Information	None of this information will be shared outside NakedPR.
General correspondence	General correspondence received or sent to companies/ organisations, which will not be shared outside of the NakedPR. organisation.