

# DATA BREACH POLICY

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## Purpose

This policy defines how Churches Fire Security Limited protects the interests of Data Subjects in preventing Data Breaches, identifying when they do happen and what action it takes post breach.

If the company discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. The Company will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

## Scope

1. This policy applies to all Churches Fire Security Limited customers, employees, management, contractors, and persons with authorised access to personal data.
2. This policy describes how Churches Fire Security Limited intends to put procedures in place to prevent Data Breaches and what the process is when a Data Breach is discovered.

## Data breaches

If the Company discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. The company will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

## Definitions

**Term:** Churches Fire Security Limited

**Definition:** *Churches Fire Security Limited* as the company to which this policy applies

**Term:** Data Controller

**Definition:** An originator and collector of personal data as per the General Data Protection Regulation set out by the EU

**Term:** Data Processor

**Definition:** An organisation that processes Personal Data on behalf of and under instruction of a Data Controller

**Term:** Data Subject

**Definition:** Any individual living person where personal data collected, stored or processed by the Data Controller can be used to identify the individual

**Term:** GDPR

**Definition:** The General Data Protection Regulation

**Term:** Data Breach

**Definition:** An incident in which personal data belonging to a Data Subject has potentially been viewed, stolen or processed by an individual, organisation or State that is unauthorised to do so.

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## Responsibilities

### Executives/Management

- Maintain this Policy.
- Approve this Policy.
- Authorise training for all staff, contractors and persons that are directed to use Personal Data by Churches Fire Security Limited.
- Enforce sanctions.
- Designate Data Protection Officer or equivalent to oversee.
- To ensure that adequate Data Security measures are in place and reviewed to protect Data Subjects.
- To act immediately on Data Breaches where directed to by the Data Protection Officer.

### Data Protection Officer

- Responsibility for the execution and maintenance of this agreement.
- To review all potential Data Breaches that are reported by the Designated Data Protection Lead.
- To qualify the potential Data Breach and follow published process as required.
- Review Schedule.

### Director, Training

- Training of all persons to which this policy applies.

### Employee responsibilities

- Understand and comply with the Company's policies regarding 3<sup>rd</sup> Party Data Processors.

## Subject Complaints

All complaints regarding anything covered in this policy.

## Sanctions

Any non-compliance of this policy by any person appointed by Churches Fire Security Limited will be subject to the Company's disciplinary process.

### Additional Notes

This policy does not form part of the formal contract of employment or contract for services, but it is a condition of employment or engagement that employees, workers or contractors will abide by the rules and policies made by the Company.

The Company reserves the right to review this policy at any time and to make such changes as it considers appropriate. If this is necessary in order to reflect changes in legislation, such changes or terminations may be made without advance notice.