

# RISK ASSESSMENT POLICY

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## Purpose

This policy defines how Churches Fire Security Limited assess, manages and mitigates the risk within Churches Fire Security Limited that is associated with the Data Subjects on which it processes personal data.

## Scope

This policy applies to all Churches Fire Security Limited employees, management, contractors, and persons with authorised access to personal data.

This policy describes the Company's objectives and policies regarding how it assess risk to Data Subjects and what actions it puts in place to minimise the identified risk.

## Impact Assessments

Some of the processing that the company carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, the company will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the measures that can be put in place to mitigate those risks.

## 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

## 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.

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## Designated Data Protection Lead

- To identify all areas of risk where Data Subjects personal data could be compromised.
- To conduct a suitable Risk Assessment on all areas identified.
- To conduct a Risk Impact Assessment on all areas identified as posing a high enough risk to require an impact assessment.
- To carry out any required action to mitigate all identified risk to an acceptable level.
- To document all work.

## Legal Counsel (or Privacy Official)

## Data Protection Officer

- Responsibility for the execution and maintenance of this agreement.
- Input and manage the process.
- Review Schedule.

## Director, Training

- Training of all persons to which this policy applies.

## Employee responsibilities

- Understand and comply with organisation'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.