



Data Protection Policy

1 About this Policy

- 1.1 *During the course of our activities Cocoon Corporate will naturally process personal data, which may be held on paper, electronically, or by any other means. This personal data will include information about our staff, therefore we recognise the need to treat it in an appropriate and/or lawful manner, and in accordance with The General Data Protection Regulation (GDPR).*
- 1.2 *This Data Protection Policy does not form part of the terms and conditions of your contract with Cocoon Corporate, and we reserve the right to amend it at any time.*

2 Data Protection Principles

- 2.1 *Cocoon Corporate shall comply with the main data protection principles of the GDPR, which state that all personal data must:*
- 2.1.1 *Be processed fairly and/or lawfully.*
 - 2.1.2 *Be processed for limited purposes and/or in an appropriate manner.*
 - 2.1.3 *Be adequate, relevant, and not excessive for the purposes intended.*
 - 2.1.4 *Be accurate and/or complete.*
 - 2.1.5 *Be kept no longer than is necessary for the purposes intended.*
 - 2.1.6 *Be processed in-line with the rights of the individual(s) concerned.*
 - 2.1.7 *Be held securely at all times.*
 - 2.1.8 *Not be transferred to people and/or organisations situated in foreign countries, without security arrangements being verified in advance.*



2.2 *'Personal Data' means recorded information that we hold about you, from which you can be identified. This may include contact details, personal information, photographs, expressions of opinion about you, or indications as to our intentions in respect of you. 'Processing' means doing anything with this data, such as accessing, disclosing, destroying, and/or using it in any way.*

3 Fair and Lawful Processing

3.1 *We will usually only process your personal data where you have given your prior consent, and/or where any such processing is necessary to comply with our legislative obligations. In other cases, processing may be necessary for the protection of your vital interests, or for the legitimate business interests of Cocoon Corporate, and/or any third party. The full list of conditions is set out in the GDPR.*

3.2 *We will only process 'Sensitive Personal Data' regarding ethnic origin, political opinion, religious belief, trade union membership, health, sex life, criminal proceedings and/or criminal convictions, where a further condition is also being met. Usually, this will mean that you have given your prior consent, or that the processing is a legislative requirement for employment purposes. The full list of conditions is set out in the GDPR.*

4 Use of Your Personal Data

4.1 *We will only process personal data about staff for legal, personnel, administrative, management purposes, and/or to enable us to meet our legislative obligations as an employer, for example to pay you, monitor your performance, and/or to confer benefits in relation to your employment with Cocoon Corporate.*

4.2 *We may process sensitive personal data relating to staff including, wherever appropriate:*

4.2.1 *Information regarding an employees physical health, mental health, or general wellbeing, in order to monitor sick leave and/or take decisions as to an employees fitness for work.*



4.2.2 *An employees racial or ethnic origin, and/or religious beliefs, in order to monitor compliance with applicable equal opportunities legislation.*

4.2.3 *In order to comply with legislative requirements and/or obligations in respect of any relevant third parties.*

5 Processing for Limited Purposes

We will only process your personal data for the specific purpose or purposes notified to you, and/or for any other purposes specifically permitted by the GDPR.

6 Adequate, Relevant, and Non-Excessive Processing

Your personal data will only be processed to the extent that is strictly necessary for the purposes intended.

7 Accurate Data

We will keep all personal data we store about you accurate and up-to-date. Personal Data that is inaccurate or out-of-date will be destroyed. Please notify us if your personal details change, and/or if you become aware of any inaccuracies in the personal data held about you by Cocoon Corporate.

8 Data Retention

We will not keep your personal data for longer than is strictly necessary for the purposes intended. This means that all data will be destroyed and/or erased from our systems when it is no longer required. For guidance on how long certain personal data is likely to be held by Cocoon Corporate before being destroyed, contact your Department Manager, or the HR Manager where necessary.



9 Processing in Line With Your Rights

9.1 You have the right to:

9.1.1 Request access to any personal data that we hold about you.

9.1.2 Prevent the processing of your personal data for direct-marketing purposes.

9.1.3 Ask to have any inaccurate data held about you amended.

9.1.4 Prevent any processing that is likely to cause unwarranted substantial damage, or distress to you, and/or anyone else.

9.1.5 Object to any decision that significantly affects you being taken solely by a computer and/or any other automated procedures or technologies.

10 Data Security

10.1 We will ensure that appropriate measures are taken against the unlawful or unauthorised processing of, against the accidental loss of, and/or damage to personal data.

10.2 We have in place policies, procedures, and technologies to maintain the security of all personal data held from the point of collection, right through to the point of destruction. We will only transfer personal data to a third party if they agree to comply with our policies and procedures, or if they already have appropriate measures in place.

10.3 Maintaining data security means guaranteeing the confidentiality, integrity, and availability of the personal data held for authorised purposes only.

11 Providing Information to Third Parties

11.1 We will not disclose your personal data to a third party without your prior consent unless we are satisfied that they are legally entitled to this information. Where we do disclose your personal data to a third party, the main data protection principles of the GDPR will be upheld at all times.



12 *Subject Access Requests*

12.1 *If you wish to know what personal data we hold about you, you must make the request in writing, with an accompanying payment of £10. All such written requests should be forwarded to your Department Manager, or the HR Manager where necessary.*

13 *Breaches of this Policy*

13.1 *We take a strict approach to breaches of this Data Protection Policy, and serious cases will be treated as an act of gross misconduct rendering an employee liable to instant dismissal following Disciplinary Procedures.*

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