

# MZ DEVELOPMENT Data Protection Policy

## Purpose

MZ Development recognizes that as part of our operations we must collect and process data. The purpose of this policy is to describe how personal data must be collected, handled, and stored in order to meet the MZ Development's data protection standards, comply with the law, and respect individual rights. The purpose of this policy is as follows:

- Comply with data protection laws and follow best practices.
- Protect the rights of staff, customers, and any related data subjects.
- Ensure transparency about how MZ Development collects, stores, and processes individuals' data.

## Scope

This Data Protection Policy applies to all business processes, information systems and components, personnel, and physical areas of MZ Development. This policy applies to the collection, processing, storage, and handling of personal data and any other procedures related to personal data of any individual in both electronic and manual format.

Individuals or groups this policy applies to include, but are not limited to:

- Executives, vice presidents, and directors
- All employees, whether employed on a full-time or part-time basis, by MZ Development
- All previous employees, whether employed on a full-time or part-time basis, by MZ Development
- All job applicants of positions at MZ Development
- All contractors, suppliers, and other people working on behalf of MZ Development
- All customers of MZ Development
- Any other data subjects identified through regular course of business by MZ Development

## Definitions

**Data:** Information in a format that can be processed, including electronic data and physical data.

**Personal Data:** Any information relating to an individual data subject who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person. This data could be anything from a name, an email address, geolocation data, or even a username or IP address.

**Data Subject:** An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier, or to

one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

**Consent:** Consent is any freely given, specific, informed, and unambiguous indication of a data subject's wishes by which the data subject, either by a statement or by a clear affirmative action, signifies agreement to personal data relating to them being processed.

**Data Controller:** The natural or legal person, public authority, agency, or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by Union law or Member State law, the controller or the specific criteria for his nomination may be designated by Union law or by Member State law.

**Data Processor:** A natural or legal person, public authority, agency, or any other body which processes personal data on behalf of the controller.

**Processing Data:** Any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

**Data Storage:** These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data protection officer.

## Governing Laws, Regulations, and Standards

Guidance	Clarification/Section
Data Protection Act 1998	United Kingdom data protection regulation
General Data Protection Regulation (GDPR) 2016/679	European Union (EU) data protection regulation

# Policy Statements

## Baseline Requirements:

- Employees will keep all data secure by taking sensible precautions and following guidelines outlined within this policy and any associated procedures.
- Data will not be shared informally; defined data access levels will be determined based on role and existing access controls.
- MZ Development will provide training to all employees to help them understand their responsibilities when handling data. Refer to Security Awareness Training Policy for further detail.
- Personal data will not be disclosed to any unauthorized person, either within the organization or externally.

## Data Collection:

- MZ Development and associated users or partners will collect personal data in a manner that is fully transparent with data subjects and in accordance with the law.
- Users will refrain from knowingly collecting personal data of any data subject without authorization from direct manager or data protection officer.
- If personal data is collected from someone other than the data subject, the data subject will be informed of the collection unless one of the following criteria apply:
  - The data subject has received the required information by other means.
  - The information must remain confidential due to a professional secrecy obligation.
  - A national law expressly provides for the collection, processing, or transfer of the personal data.
- When determined that the notification of the data subject is required, notification should occur promptly and adhere to guidelines within the Consent Procedure.
- When necessary, MZ Development will obtain consent from data subjects in accordance with the Consent Procedure and through authorization of the data protection officer.
- Consent from the data subject will be provided in writing.
- Consent obtained orally from a data subject will be reviewed by the data protection officer.
- MZ Development's external facing website(s) will include a privacy notice and cookie notice.

## Data Storage:

- When data is stored electronically, it will be protected from unauthorised access, accidental deletion, and malicious hacking attempts.
- MZ Development will protect data with strong passwords. Refer to the Access Control Policy for further detail.
- Users will refrain from using removable media; if data is stored on removable media devices, they will be stored securely.
- MZ Development data will be stored on designated drives and servers, and will only be uploaded to approved cloud computing service(s).
- Servers containing personal data will be sited in a secure location, away from general office space. Refer to the Physical Security Policy for further detail.

- Users will refrain from saving data directly to devices.
- Users will refrain from storing data on paper and only print when necessary.
- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- MZ Development users will ensure paper documents are not left where unauthorized people could view them, for example, on a printer.

#### Data Use:

- Where applicable, MZ Development will provide each data subject with information regarding the processing of their information.
- MZ Development will consider the data subjects' perspective whenever processing personal data.
- Any processing of data subjects' data will meet at minimum one of the processing requirements outlined within the Processing Guidelines.
- When working with personal data, users will ensure screens are locked when left unattended.
- MZ Development users will not informally share personal data. For example, personal data will not be shared via email unless explicitly noted as being encrypted.
- Users will refer to manager or data protection officer if personal data is anticipated to be transferred outside of the users' region.
- When possible, users will access personal data via a master copy or set of data.

#### Data Accuracy:

- MZ Development will take reasonable measures to ensure that personal data remains accurate across the organization.
- All users at MZ Development will take reasonable steps to ensure personal data is kept as accurate and up to date as possible.
- Data stored at MZ Development will be held in centralized locations. Users will not create unnecessary additional data sets.
- Where applicable, MZ Development will ensure data subjects can easily update their information.

#### Data Retention:

- Data should be regularly reviewed against the Records Retention Procedure. If no longer required, data should be deleted and disposed of. Refer to Records Retention Procedure for further detail.
- Data backups will be executed in alignment with the Backup and Recovery Schedule and executed by IT.
- Paper documents will be shredded and disposed of securely when no longer required.

#### Data Protection:

- Security staff will utilize necessary physical and technical controls and organizational measures to ensure all infrastructure containing data is protected and secured. Refer to Physical Security Policy and Access Control policy for further detail.
- Users will follow associated procedures and notify relevant staff when reporting incidents or data breaches. Refer to the Incident Response Policy for further detail.

## Providing Information – Data Subject Requests:

- MZ Development will ensure that requests based on each of the following data subject rights can be satisfied:
  - Objection to processing
  - Objection to automated decision making and profiling
  - Restriction of processing
  - Data portability
  - Data rectification
  - Data erasure
- MZ Development aims to ensure that individuals are aware that their data is being processed and they understand:
  - How the data is being used.
  - How to exercise their rights.
- When requested, MZ Development will verify the identity of the data subject.
- Data subject rights requested will be managed by the data protection officer.
- MZ Development will respond to each data subject request within 30 days.
- Instances when a data subject request cannot be adequately addressed, the following information will be provided to the data subject:
  - An acknowledgement of receipt of the request
  - Any information located to date
  - Details of any requested information or modifications, which will not be provided to the data subject, the reason(s) for the refusal, and any procedures available for appealing the decision
  - An estimated date by which any remaining responses will be provided
  - An estimate of any costs to be paid by the data subject (e.g. where the request is excessive in nature)
  - The name and contact information of the MZ Development point of contact

## Relevant Policies & Procedures

- Information Security Policy

## Exceptions

**MZ DEVELOPMENT** acknowledges that under rare circumstances, certain users may need to employ systems that are not compliant with these policies. All such instances must be approved in writing, and in advance, using the Exception process and required documentation.

## Violations

**MZ DEVELOPMENT** network users who willingly and deliberately violate this policy will be subject to disciplinary action up to and including termination and/or legal action.