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A Introduction

Working for my clients involves an exchange of data, to varying degrees. Just receiving or making a phone call leaves a data trace on my phone, and any further involvement will obviously lead to further data being accumulated automatically or as a result of my work on behalf of my clients. The rules governing how we handle personal data (any data that can be directly linked to a particular individual) are strict and require careful handling of data.

Dealing with client files is a related issue, and involves a level of trust on their behalf and a clear obligation on my side that any information I derive from my work is strictly confidential (unless I am legally obliged to divulge any information to the relevant authorities).

I am ICO registered and therefore required to uphold the regulations governing data manipulation under the GDPR rules. In order for you to rest easy, this document describes how and why data is collected on my end of our collaboration, how long and where it is retained and why and when it is deleted completely from my electronic or physical storage.

As a default, I do not share any client-owned or client-related data, unless legally required.

Under the new rules, you have the right

- ✳ to inquire which personal data I hold on you and for which reasons;
- ✳ to request a correction/rectification of the data held by me;
- ✳ to restrict how I use your personal data
- ✳ to complain to the ICO if you believe I am handling your data incorrectly.

B Data collection

“Data collection” does not describe an active effort on my part to ‘collect’ any data: I use this term to describe the possible accumulation of data pertaining to a client through the practice of working for that client. This could be simply saving your phone number to my mobile, or it could be working on your client data to reorganise your systems so you can make better use of that data in the future.

In the course of working for my customers, I will undoubtedly deal with some of their data. Which type of data? That depends on what you have asked me to do and how that request affects my need to access, treat or hold your data. Since my business is very wide in scope, from physical organisation at your home to virtual manipulation of your electronic data at my place of business, the situations and requirements will be very different in each case. I have attempted to give as clear an impression of the different aspects of data manipulation in the sections below.

1 Phone calls

Phone calls from potential clients leads to their phone numbers being saved on my phone. I will usually add a name to those numbers, in the interest of easily recognising callers and being able to make informed choices during my busy working days.

2 Text messages (business phone only)

I prefer to communicate with my clients through phone calls or email messages for ease of information management. Any text messages will only be kept on the business mobile.

3 Email

I receive emails on my business phone and on my business laptop, but they are only retained on my business laptop, never on the business mobile.

3.1 Email addresses

Client email addresses are retained by the email program on my business laptop only.

3.2 Email messages

Any trace of incoming (and outgoing) emails will only be kept in one single place: on my business laptop. I do NOT use online email systems for business purposes, nor do I make use of clouds storage systems for emails.

4 Data exchange on portable media

Any data transmitted to my business laptop through portable media is transferred to the relevant client's folder on my business laptop hard drive, and subsequently deleted from the USB media.

5 Online data exchanges (dropbox, google drive, etc.)

For business clients, I occasionally work on large amounts client files. In this case, work is often done off-site at my business premises. If it becomes necessary to work on large amounts of data, or on a regular basis, online data exchange becomes necessary through shared online folders.

6 Electronic client files

If any data from online data exchanges is downloaded, this will be saved in the dedicated client folder on my business laptop and treated just like any other client information.

7 Mailing lists

Mailing lists are meant to send out my monthly newsletter (marketing) and very occasional information bulletins (important information relevant to my readership) using Mailchimp. This

system only collects email addresses, entering a name remains optional on that particular medium. Data 'collection' involves an active opt-in, in line with the GDPR.

8 Administrative files

Of course, I have to do accounts for my business. Business accounts have to follow certain rules, including a way to clearly identify the invoice recipients for tax purposes. This means I have an obligation to keep a record of more detail on my active clients, including physical addresses, phone numbers and email addresses.

9 Backup files

I take regular backups of my business laptop, including client-related data. Backups are kept strictly locally on one dedicated USB drive.

10 Physical client files

I will never take physical client files off-site, unless the client allows me to do so for very specific reasons of data manipulation.

When decluttering administrative documents, extreme care is taken to ensure that none of the documents are lost, removed or destroyed (unless explicitly being told so), and any knowledge derived from this activity is considered strictly confidential.

C Data retention

I generally try to keep the amount of data I retain to an absolute minimum. Data can reside on several types of media: diverse hard drives, online (cloud) storage, or in physical files. Where possible, data is secured by passwords and access checks. Data will be retained only as long as necessary to properly finish any job I have been charged with by my clients.

1 Business laptop

My business laptop serves as my primary data repository. Any client-related data is saved in a single location within a clearly identifiable folder (with subfolders, if deemed necessary for clarity).

2 Business phone

My business phone relies on online accessibility of information:

- ★ Incoming emails can be read on the phone only as long as they have not been downloaded to the business laptop's hard drive.
- ★ Calendar items reside online to allow for exchange with business laptop.
- ★ Text messages are used only exceptionally before moving to email for more detailed exchanges.

3 USB media

Any data transmitted using USB media will be deleted from the USB drive once the transfer to my business laptop's hard drive has been successfully completed and verified.

4 Backup drive

Backups of the business laptop will be kept up to three iterations on a single dedicated USB drive. The latest backup will reflect the current status of retained data on the business laptop at the time of the latest backup.

5 Cloud storage

5.1 Dropbox

I use dropbox for data storage, including some client-related files. This client-related material is kept to the bare and useful minimum and remains on dropbox only as long as necessary.

5.2 Google drive

If requested by the client, I use google drive temporarily for data transmission purposes.

5.3 Large data transfer (WeTransfer and similar)

If requested by the client, I occasionally use such systems, set to automatically delete the data after 7 days.

5.4 Other online data

- * I use an online calendar to access my agenda on business phone and business laptop.
- * I don't use cloud-based email services like Gmail or similar for business purposes.

6 Printed materials

I do not retain any client information in printed format.

7 Physical (paper) files

I avoid taking any paper materials from clients' premises, unless specifically instructed to do so and only if this is absolutely necessary to fulfil the tasks at hand. In these exceptional cases, any such materials are returned to the respective client as soon as possible.

8 "Mental storage"

Working with data involves reading and manipulating it. This will leave some knowledge behind, of course. It speaks for itself that any retained knowledge through work with electronic or paper materials will be considered strictly confidential.

D Data deletion

1.1 Deletion schedules

Any files pertaining to ex-clients will be subsequently deleted from my storage, with the exception of contact information (phone, email, mail address) necessary for the accounting process and information required to be retained by law.

Results of creative work for current clients (templates, final documents, etc.) will be kept for a reasonable period to ensure the possibility to assist them, should any problems arise through the client's use of the result of my work. What is considered 'reasonable' will depend on the type of work, applying common sense on retention, with an absolute maximum of 12 months.

1.2 Data kept long-term

Client (and ex-client) contact information will be retained indefinitely for accounting purposes, unless instructed otherwise by the client.

Creative products that can be useful for future work and documentation of my activities, may be retained indefinitely in their raw template form, provided they cannot be traced to the original client through their content or format.

E Procedures

1 Client data (contact information)

I collect a minimum amount of data for administrative purposes from each client who gets in touch with me. That includes **full name** and **physical address** for accounting needs, **phone number** and **email address** as means of contact and communication, as well as any signed contracts, agreements and other papers.

This data can be identified by the client's name and is retained in my

- * administrative folders (physical address and contact details, signed papers),
- * email program (email address), and
- * my phone (phone number).

Any client data collected during intake will be saved in the indicated locations and retained for future reference even after work for the client has been concluded.

2 Client data (other than contact information)

Client data include any client-owned information manipulated by ClutterMeister.

Client data that is (electronically) transmitted to me will be retained in a clearly labelled folder in my document filing system on the hard drive of my business laptop and/or the email filing system. This means that backups will retain that information as well (see dealing with the backup data on page 47).

3 When client work has been concluded

I do not keep client-owned data after the work has been concluded, unless it is a template or other creative solution that I need to access to provide assistance once the client has started using it. (Keeping a copy of the last version is also helpful in case the delivered product is damaged by incorrect usage, and can therefore be easily replaced with a correct version. In such a case, the version I retain will never contain any client-owned information but will be a blank slate template.)

4 What happens to data on the backup drive?

I take regular backups (about once a month) of my business laptop and retain a maximum of three iterations of my data before I delete it. In practical terms this translates into a delay of maximum three months before any data on my business laptop will disappear from my records once it has been removed from the laptop.

5 Mailing list

Mailchimp mailing list signup contains a double opt-in setup and adding first and last names to the signup is optional. Email (and name) data collected will be used exclusively for the purpose of sending out the newsletter and (very) occasional subject-related information.

Contact data resides exclusively on that medium. Data is only downloaded for checking purposes and will be deleted locally as soon as the maintenance process has been finalised.

Any outgoing message has a clearly indicated unsubscribe option available to the recipient at all times.

F Information requests

1 Data retention

Upon request from the client, I will produce a record or existing information from the following locations:

- * Client contact information as described in “Client data (contact information)” above;
- * Hard drive filing system (a full list of documents in my possession at the time of request);
- * List of emails forming the correspondence with the client (as present at the time of request);
- * Other locations, as and if applicable

2 Data removal

2.1 Electronic data retained by ClutterMeister

Upon request from the client, all information pertaining to the client will be deleted, including all files in the locations mentioned in the previous section (“Data retention”), any pertinent

text messages on my business phone, but with the exclusion of contact information as listed in “Client data (contact information)” above and any accounting information I am required to retain for tax or legal reasons.

2.2 Mailing list

Subscribers can unsubscribe at any time from the list. It is recommended they do so themselves as that will also preclude their contact details to be added again in the future.

G Data breach

In the unlikely event that data is accessed by an unauthorised person (hacking or accidental access), whoever is affected by the breach will be informed of the fact.

Furthermore, the Information Commissioners Office (ICO) will be informed of the breach and the necessary measures will be taken to stop the breach and follow procedures laid out by the ICO.