

#### **A** Introduction

Working with you 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 you.

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 clear obligation on my side that any information I derive from my work is strictly confidential.

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 gives a basic overview of your rights to your own data as is retained by me.

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

Under data privacy 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 imply an active effort on my part to 'collect' any data: it describes actions like saving your phone number to my mobile for calls, or accepting your email address for the purpose of sending information to you.

## **C** Procedures

## 1 Client data (contact information)

I retain a minimum amount of data for administrative purposes from each client who gets in touch with me. That includes **full name** and **mail 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 may be retained in my administrative folders (physical address and contact details, signed papers), email program (email address), and my phone (phone number).

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## 2 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 my newsletter.

Contact data resides exclusively on that platform and each outgoing message has a clearly indicated 'unsubscribe' option available to the recipient at all times.

# 3 Client data (other than contact information)

Any client-related data 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.

# **D** Information requests

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

- \* Your 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 (at the time of request);
- \* Other locations, as and if applicable

#### E Data removal

# 1 Electronic data retained by ClutterMeister

Upon request, all information pertaining to you will be deleted, including all files in the locations mentioned in the previous section, any pertinent text messages on my business phone, but with the exclusion of information I am legally required to retain.

## 2 Mailing list

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

## F 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.

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