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This **Company Data Protection Policy** refers to Cabot Trustees Limited commitment to treat information of employees, clients and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

### **Scope**

This policy refers to all parties (employees, job candidates, member trustees, providers etc.) who provide any amount of information to us.

### **Who is covered under the Data Protection Policy?**

Employees of our company and any other external entity must follow this policy. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need agreed access to data.

### **Policy elements**

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, national insurance numbers, financial data etc.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply:

#### **Our data will be:**

- Accurate and kept up-to-date as far as is reasonably possible.
- Collected fairly and for the intended purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorised or illegal access by internal or external parties

#### **Our data will not be:**

- Communicated informally
- Stored for no longer than is reasonably required to be.
- Transferred to organisations or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities or Government bodies)

In addition to ways of handling the data the company has direct obligations towards data subjects to whom the data belongs. Specifically we must:

- Let data subjects know which of their data is collected
- Inform data subjects about how we'll process their data
- Inform data subjects about who has access to their information and restrict the processing of it
- Have provisions in cases of lost, corrupted or compromised data
- Allow data subjects to request that we:
  - modify,
  - reduce,
  - correct data contained in our databases
- Additionally, data subjects may exercise the "right to be forgotten" where any data will be erased. However, this will only be permissible as far as any legal obligation and legitimate interest allows.

### **Actions**

To exercise data protection we're committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Build secure networks to protect any online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Communicate statements on how we handle data
- Establish data protection practices (document shredding, secure storage, data encryption, frequent backups, access authorisation etc.)

These data protection provisions will appear on our website and are available on request

### **Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.