

# Phase 3 General Data Protection Regulations (GDPR Policy)

**Phase 3 policy document**

**Updated May 2025**

# Phase 3 General Data Protection Regulations (GDPR Policy)

## Context

**Policy owner:** James Proctor, Chief Operating Officer

**Policy date:** 12<sup>th</sup> June 2020

**Last review date:** 30<sup>th</sup> May 2025

**Version:** 1.2

**Review date:** To be reviewed upon any legislative, significant business or service change or following the completion of 12 months since the last review, whichever is sooner.

**Purpose:** To describe the commitment to secure the efficient processing of client data, systems, application, and network access.

**Scope:** This statement applies to all performance of P3 services by P3 employees in the course of their work. It applies to Associate contractors authorised to access Client systems or data via P3 systems or network.

**Linked documents:** Phase 3 Contracts of Employment

Client and Contractor terms and Conditions

Checkmark IT Solutions Terms and Conditions

IT Policy

Code of Business Ethics

**Public Information document about Microsoft Azure data centres:**

<https://www.microsoft.com/en-us/cloud-platform/global-datacenters>

**Microsoft Privacy and Security Compliance information:**

<http://download.microsoft.com/download/1/6/0/160216AA-8445-480B-B60F-5C8EC8067FCA/WindowsAzure-SecurityPrivacyCompliance.pdf>

## Roles and responsibilities

- Assad Ahmed, Founding Director, is the Statement owner responsible for writing, reviewing and ensuring compliance by P3 employees and contractors.
- James Proctor is the Chief Operating Officer and is responsible for identifying Client requirements for data security and processing agreements.
- James Proctor is the Data Protection and Operations Manager.
- Marilyn Summers, Head of Quality Assurance & Governance, is responsible for the adherence of P3 employees to P3 policies for conduct at work.
- P3 partners for delivery of IT services are: Checkmark IT Solutions
- P3's IT partner have the responsibility to provide second line IT support, as well as security protections.

## GDPR and Data Protection Compliance Statement

This document sets out how we protect the Personal Data (as defined below) that we process when we supply services to our customers. This document also sets out the standards we expect from our suppliers who may also access Personal Data. 'Personal Data' has the meaning as set out in the Legislation but put simply, it means any data that identifies a person (e.g., name, address, email address, mobile number).

- We take the privacy of the Personal Data which we handle very seriously.
- Phase 3 Consulting Limited ('P3', 'we', 'our' or 'us') are a 'Data Processor' for the purposes of the Data Protection Act 1998 and as of 25 May 2018, the General Data Protection Regulation ('GDPR') (as applicable the 'Legislation'). We will take all appropriate steps to ensure compliance with the Legislation.
- We only process the Personal Data which we need in order to provide our services.
- We only sub-contract our services to third party suppliers who contract in writing with us and agree to be bound by the terms of this statement. (In providing our services our suppliers are also 'Data Processors' as defined in the Legislation.)
- In the provision of our services we process Personal Data on behalf of our customers and/or their clients who are the 'Data Controllers' (as defined by the Legislation). We will only process Personal Data as stipulated in any agreement with our customers or further to our customers' written instructions. Our suppliers only process Personal Data in accordance with our written instructions.

- We keep all Personal Data confidential and secure, and we have incorporated the necessary technical and organisational measures to safeguard any Personal Data processed by us, in accordance with the Legislation which for information includes the use of secure passwords, user access controls, encryption, technical security such as firewalls and physical security including alarms, secure locks and specific entry passes for authorised individuals. However, while we will use all reasonable efforts to safeguard your Personal Data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Personal Data that is transferred from you or to you (further to your instructions) via the internet.
- We will report any breaches or potential breaches to our customers as soon as we become aware of them (in any event within 24 hours) and we will provide sufficient information as is required for our customers to decide on how to handle the breach and to report such a breach to the relevant supervisory authority, if necessary. If our customer so requests, we will ensure that any further processing ceases.
- We record the processing activities undertaken on behalf of our customers and provide our customers or their authorised representatives with access to the relevant records and premises on reasonable notice, during office hours for the purpose of carrying out an audit to ensure compliance with the Legislation in the supply of the agreed services.
- We will promptly inform our customers of any request made by a regulator or data subject and we will comply with such requests subject to the prior written approval of our customer (unless we are legally prevented from obtaining such approval) and the payment of our reasonable costs in so doing.
- We may send Personal Data to our suppliers in order to provide the services to the Customer. If we need to send any Personal Data to any other third party then we will obtain our customer's prior written consent before doing so, unless we are required by law to take such an action, in which case we will promptly inform our customer as soon as we are permitted to do so.
- We take reasonable steps to ensure the reliability and integrity of our employees or representatives who may have access to any Personal Data which they process on our behalf, and we require such employees and representatives to undergo a reasonable level of training regarding the handling of Personal Data, appropriate to the type of Personal Data being processed and set out in our company handbook our employee's obligations regarding confidentiality and the processing of Personal Data. We will also procure that our suppliers take the same steps in relation to their employees or representatives.
- Any questions about this statement or how we handle your Personal Data should be addressed to our data manager: James Proctor at our registered office or to [James.Proctor@phase3.co.uk](mailto:James.Proctor@phase3.co.uk)



# Phase