

1. Data Protection Principles

Investment Property Trainers Limited is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- (a) Processed lawfully, fairly and in a transparent manner in relation to individuals;
- (b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- (c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- (e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- (f) Processed in a manner that ensures appropriate security of the personal data, including
- (g) Protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General Provisions

- (a) This policy applies to all personal data processed by Investment Property Trainers Limited.
- (b) The Administration team shall take responsibility for Investment Property Trainers Limited's ongoing compliance with this policy.
- (c) This policy shall be reviewed at least annually by a Data Protection Officer or when legislation changes and forces us to amend the policy.

3. Lawful, Fair and Transparent Processing

- (a) To ensure its processing of data is lawful, fair and transparent, Investment Property Trainers Limited shall maintain a systematic filing system and ensure all information is easily accessible if an individual desires to access their personal data.
- (b) Individuals have the right to access their personal data and any such requests made to Investment Property Trainers Limited shall be dealt with in a timely manner.

4. Lawful Purposes

- (a) All data processed by Investment Property Trainers Limited must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- (b) Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data. (Upon a customer signing Terms and Conditions this is then classed as evidence of opt-in consent).
- (c) Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Investment Property Trainers Limited's systems.

5. Data Minimisation

- (a) Investment Property Trainers Limited shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- (a) Investment Property Trainers Limited shall take reasonable steps to ensure personal data is accurate.
- (b) Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- (c) In the case of employees a "Change of Information" form is available if their information changes in order to comply with GDPR in keeping data up-to-date and accurate.

7. Archiving / Removal

- (a) To ensure that personal data is kept for no longer than necessary, Samuel Leeds Ltd shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- (b) The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- (a) Investment Property Trainers Limited shall ensure that personal data is stored securely using anti-virus software that is kept-up-to-date and where appropriate password protect the relevant areas / documents.
- (b) Access to personal data shall be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.
- (c) When personal data is deleted this should be done safely such that the data is irrecoverable. Appropriate backup and disaster recovery solutions shall be in place.

9. Breach

1. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Investment Property Trainers Limited shall promptly assess the risk to people's rights and freedoms and follow the Data Breach Response and Notification Procedure, fill in the Data Breach Register, and notify the Data Subjects.