

Traverse regards the lawful and correct treatment of personal information as very important and therefore ensures that personal information is treated as such. Traverse management is committed to protecting individual information and endorse the principles of the Data Protection Act 1998, and the General Data Protection Regulation (in force 25 May 2018) which form part of its corporate practice, governance regime and its fundamental objectives to maintain confidence with clients, third parties and employees.

Personal data is information that relates to a living individual who can be either:

- Identified from that data;

or

- Can be identified from the information combined with any other information that is in the possession of the person or organisation holding the information.

Basic personal data includes:

- Name
- Address
- Date of birth
- Telephone numbers
- Email addresses
- Online identifiers including cookies and IP addresses (new under GDPR)
- Bank account details

The Data Protection Act also identifies includes “sensitive personal data”. Before processing any sensitive personal data Traverse must gain explicit consent from the individual.

Sensitive personal data includes racial or ethnic origin, physical or mental health conditions, offences or alleged offences, religious beliefs, and details regarding sexual orientation.

Data privacy encompasses other factors that could be used to identify an individual, such as their genetic, mental, economic, cultural or social identity.

Personal information must be:

- Processed fairly and lawfully and not processed unless specific conditions are met
- Obtained only for one or more specified and lawful purposes, and not processed further in any manner incompatible with that purpose or those purposes
- Adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Not kept for longer than is necessary
- Processed in accordance with the rights of data subjects under the Act
- Protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss or destruction of, or damage



- Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

As of 25 May 2018 (under GDPR) data must be:

- Lawful, fair and transparent – processed lawfully, fairly and in a transparent manner
- Limited – collected for the specified explicit and legitimate purposes and not further processed
- Minimised: Adequate, relevant and limited to what is necessary in relation to purposes for which processed
- Accurate and kept up to date
- Not kept for longer than necessary
- Kept securely

Traverse, through appropriate management and controls, will:

- Observe conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Apply checks to determine the length of time information is held
- Ensure that the rights of people about whom information is held can be fully exercised under the GDPR

These include:

- The right to be informed that processing is being undertaken
- The right of access to one's personal information
- The right to prevent processing in certain circumstances
- The right to correct, rectify, block or erase information which is regarded as wrong information
- Appropriate technical and organisational security measures being taken to safeguard personal information
- Ensuring that personal information is not transferred abroad without suitable safeguards
- Treating people impartially and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Setting out clear procedures for responding to requests for information.

In addition, Traverse will ensure that:

- There is someone with specific responsibility for Data Protection.
- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice
- Everyone managing and handling personal information is appropriately trained to do so



- Everyone managing and handling personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows how to do so
- Queries about handling personal information are promptly and courteously dealt with
- Methods of handling personal information are clearly described
- A regular review and audit is made of the way personal information is held, managed and used
- Regular assessments of performance and compliance with handling personal information take place.