

# Data Breach and Data Loss Policy

## Data Breach Reporting

The Information Commissioners Office (ICO) defines a data breach as follows:

*A personal data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This means that a breach is more than just losing personal data.*

BELBIN treat data loss and data breaches as a high priority issue and make every effort to notify affected customers and the Information Commissioners Office (ICO) as soon as possible. In some cases, BELBIN is only required to notify the ICO of data breaches and not the affected customer, but BELBIN will make every effort to notify both parties within the required 72 hours of BELBIN becoming aware of the breach.

In the event of a data breach, customers will be provided with a report from BELBIN within 72 hours containing the following information:

- The nature of the data breach, including which specific types of personal information and a list of the specific individuals concerned. Where such specificity is not possible, approximations will be provided.
- The contact details of the relevant BELBIN staff member to contact for more information if necessary.
- Details of the investigation carried out by BELBIN and proposed measures to be taken by BELBIN to resolve the situation and prevent such breaches from occurring again. If this investigation takes longer than 72 hours then these details may be part of a secondary, follow up report at a later date.

This report will be provided by e-mail to the registered BELBIN account holder's e-mail address. If others need to be notified or provided with the report, please contact us to ensure that we have the most relevant details.

## Data Breach Detection

BELBIN customer data is housed on our own dedicated servers, managed in co-operation with Smart Media Ltd. These servers can only be accessed directly by BELBIN or by Smart Media Ltd employees.

The Smart Media Ltd network has multiple layers of data breach protection and monitoring, both hardware and software. The servers themselves have an up to date anti-virus system and are kept up to date with all relevant software and security updates.

BELBIN employees are aware of what constitutes a data breach and how this should be reported within the organisation, be that physical data loss on devices/print outs or online through our web system.