

INTERNAL PRIVACY POLICY

1. We expect that ALL data is kept secure and confidential at all times.
2. This policy shall incorporate all the decisions from the 8 points on the GDPR planning document.
3. ALL staff will have periodic training on Data Protection and the GDPR. New staff will be trained as soon as practicable.
4. ALL staff are encouraged to report all breaches or potential breaches to a Director immediately. We acknowledge the 72 hour reporting deadline.
5. Any 'subject access requests' will be discussed by the Directors within 3 working days of receipt. We acknowledge the one-month time limit.
6. Any 'right to be forgotten' will be discussed by the Directors within 3 working days of receipt. We acknowledge our FCA record-keeping obligations.
7. Documents shall not be destroyed without the Board of Directors agreeing a policy. All staff must be made aware (at least annually) of the record-keeping rules for FCA authorised firms.
8. All documents which hold sensitive or financial data can only be sent via email with the utmost caution – for instance sending to hotmail/gmail/yahoo accounts – if in doubt consult Compliance Department. Valuations can only be sent by email if they are password protected.
9. All 'supplier' firms / contractors who have access to any data must provide written confirmation of their own Data security policy at least annually.
10. All laptops and PC's which are outside AMR's main premises must be encrypted.
11. Any external memory devices (such as memory sticks) can only be used if registered with a Director.
12. A disaster recovery plan is maintained and updated at least annually.
13. Any marketing campaign material will only be issued to existing clients (who have not opted-out).
14. AMR will never share our clients' data with any other firm for marketing purposes.
15. AMR's website / security will be reviewed at least annually and written confirmation be obtained by a suitably qualified IT specialist.
16. Information from 'prospect' clients will be destroyed after six months – from the last date of contact.
17. All Human Resources / payroll records / recruitment records will be maintained for the minimum periods as advised by our legal advisers.