

Fjordr Limited Data Protection Policy

v. 230518

Fjordr is a small company that holds very limited amounts of personal data. The personal data held by Fjordr falls into two main categories:

- Personal data in the form of contact and financial details relating to its Directors, held solely for the purpose of conducting Fjordr's business.
- Personal data in the form of contact details for a range of clients and other communicants, held solely for the purposes of communication in the course of Fjordr's business activities.

Fjordr does not engage in projects primarily concerned with processing personal data for clients. However, limited processing for clients of personal data – in the form of contact details – may occur as an adjunct to the primary purposes of a commissioned project. For example, contact details may be processed for individuals who are to be contacted on behalf of the client in order to invite them to project events or to share project documents in the course of consultation.

Personal data relating to Fjordr's Directors is held with their express consent for as long as they remain Directors of Fjordr.

Contact details held by Fjordr comprise data such as name, job title, organisation, address, email, telephone. Contact details have been provided by the individuals to which they relate in the form of business cards and emailed details, or are available in public sources (e.g. contact details provided on websites).

Fjordr does not obtain contact details from third parties beyond those provided either publicly or as products (such as yearbooks) forming part of the general membership services of organisations of which Fjordr is a member. Fjordr does not obtain personal data through its supply chain.

Fjordr does not process or analyse personal data beyond organising it with appropriate field names and selecting recipients for specific communications (e.g. invitations to a project event). Fjordr does not employ sub-contractors to process personal data.

Consent for Fjordr to hold and use personal data arises either from the individual actively providing their contact details to Fjordr on a card or in an email; from them agreeing that their details be included in a public source such as a website; and/or from them agreeing that their details be included in general membership services (such as yearbooks).

Fjordr does not engage in direct marketing exercises and does not issue digital or hard copy newsletters. Fjordr does not sell or otherwise pass personal data to third parties.

Fjordr holds contact details in two principal forms:

- within Outlook as part of a secure Office 365 service provided by Microsoft. The service itself and devices accessing the service are password protected.
- in project-specific spreadsheets held on Fjordr's network. The network is protected by a firewall. All devices and servers are password protected.

Fjordr does not engage in large-scale data processing. Fjordr does not employ a Data Protection Officer.

Where Fjordr is aware of any serious breach relating to personal data, Fjordr will report the breach to the Information Commissioner's Office within 72 hours.

Fjordr retains personal data acquired since it was established in January 2012. Fjordr does not routinely delete contact details based on passage of time.

Any person that would like to know what personal data Fjordr holds about them and what Fjordr is doing with that data should email info@fjordr.com setting out the grounds on which they believe Fjordr holds personal data about them. Fjordr will answer all reasonable queries within one month of request.

Any person that wishes Fjordr to amend, restrict or delete personal data about them held by Fjordr should email info@fjordr.com with details of the data they wish to be amended, restricted or deleted. Fjordr will amend, restrict or delete such personal data within one month of request.

Any queries about Fjordr's Data Protection Policy can be emailed to info@fjordr.com.

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