

## Data Protection and Privacy Statement

### **General Principles:**

Perla Development abides by, and works to, the principles of the Data Protection Act 1998 and the GDPR 2018.

- We ensure that client data and information remain confidential
- All members of staff, associates and sub-contractors are required to maintain client confidentiality.

All client data and information are:

- clearly identified, and appropriately and securely stored
- made available to clients, or on a need to know basis only with client permission.

At all times, confidential client information that is not in immediate use is kept under secure cover. On leaving the business premises at any time, Perla Development staff are required to ensure that all client information is securely filed and that the Perla Development lap top is secured against unauthorised access.

### **Data Retention:**

Perla Development is requested to administer, collate, interpret and feedback psychometric profiles such as the Myers Briggs Type Indicator (MBTI) and Belbin Team roles profiling tool for the purposes of executive coaching, team events and management development training.

These are generated and stored on these organisations systems and subject to their data retention and deletion policies.

- MBTI - OPP Assessment Ltd,
  - <https://www.opp.com/en/About-OPP/Privacy-Policy>
- Belbin Team Roles
  - <http://www.belbin.com/about/terms-and-conditions/our-policies>

Our data retention policy for **MBTI and Belbin team role** profiles is as follows and is in line with the OPP and Belbin privacy policies.

1. All hard and soft client files purchased on behalf of the client are returned to the client.
2. No hard copies of client personal data are retained longer than 18 months from its generation and no longer than 90 days in the case of Belbin Team roles.

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3. Anything available in softcopy is filed electronically in a soft client file for no longer than 18 months, or by agreement with the client, and no longer than 90 days in the case of Belbin Team roles.
4. All electronic information is held by Perla Development on a secure lap top and back up hard drive, which is housed securely on site.
5. We seek consent from individuals to manage and retain data in these ways using a consent form.

Perla Development may also be asked to administer and feed back **360-degree** feedback reports for clients (such as VOICES or the KF 360), in order to support annual performance development and 6>12-month executive coaching assignments. These hard and soft copy reports are shared with the client and electronic copies are stored securely by Perla Development for no longer than 18 months, or by agreement with the client.

Records that are to be destroyed will either be shredded before disposal or collected by a classified contractor who provides a duty of care.

***Personal Details:***

- Perla Development uses the names and email addresses of clients, suppliers, colleagues and associates for the sole purpose of conducting its normal, day to day business. Typical activities might include exchange of emails, texts, addressing invoices and miscellaneous written correspondence.
- Names and email addresses are not stored on the Perla laptop other than being available in the Outlook look up facility.
- Received emails are sometimes retained in Outlook folders in the execution of Perla's normal day to day business. Otherwise they are deleted.
- Names and contact details are **not** held on any central address book or social media sites, but some phone numbers are stored in the Perla business phone (which is finger print recognition protected) and in a hard copy business card index.
- Perla may retain some biographies of its associate partners in order to undertake its normal day to day business.

We will never forward any of the above information or records to any third party without express permission of the individual or company concerned.

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