



## Girlfridayz

Business support to sole trader & SME's

28 Cambria Road

London SE5 9AE

E: [girlfridayz@girlfridayz.com](mailto:girlfridayz@girlfridayz.com)

W: <http://girlfridayz.com>

M: 07931089744

## Privacy Statement — Cookies policy & Confidentiality Policy

### Cookies policy

16.1 We will collect information about your personal details both when you tell us what these are and by analysis of traffic on the Website, including by using cookies.

16.1.2 A cookie is a piece of information that is stored on your computer's hard drive by your web browser. On revisiting the Website our computer server may recognise the cookie, giving us information about your last visit. Most browsers accept cookies automatically, but usually, you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you may still use most of the features of the Website.

16.1.2.1 We use cookies for recognition purposes at login through the use of a persistent cookie placed on your hard drive. This cookie may be deleted at the end of each session/visit.

16.1.2.2 We may delete cookies on your request to comply with the privacy of your information and prevent access by third parties or search engine.

### **Collection of information**

16.2 We use information collected about you to help us (a) develop the design and layout of the Website to ensure that it is as useful and enjoyable as possible.

16.3 In addition, we may provide aggregate statistics about our services, competitions, clients, traffic patterns and other site information to third-parties, but these statistics will not include any information that could personally identify you. In the event that your personal details become untrue, inaccurate or incomplete, or in any event, you have the right to access your personal details and may rectify the same. You confirm that you do not and will not consider any of the above as being a breach of any of your rights under the Telecommunications (Data Protection and Privacy) Regulations 1999.

16.4 We reserve the right to access and disclose individually identifiable information to comply with applicable laws and lawful government requests or requests by the police investigating suspected illegal activities, to operate our systems properly or to protect ourselves or other Users. We also reserve the right to disclose individually identifiable information to third parties if a complaint arises concerning your use of the Website, and that use is deemed by us inconsistent with the Conditions.

16.5 When you input information on our contact form, booking facility or request services from us, we offer appropriate physical, electronic and managerial security measures in order that you



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may input information safely whilst effectively preventing that information from being accessed by unauthorised persons. In addition, we have strict security procedures covering the storage and disclosure of your information in order to prevent unauthorised access to comply with the UK Data Protection Act 1998. This means that sometimes we may ask for proof of identity before we disclose personal information to you.

16.6 Some links in the software package provide information concerning the referrer URL and is used for marketing and research purposes only. Upon using this website and software package you agree to accept this tracking method and to only remove it if you are a customer. We welcome your questions and comments about privacy issues and the design of the Website. Should you have such comments or have a complaint about how we are using your personal data, please send an email to [enquiry@girlfridayz.com](mailto:enquiry@girlfridayz.com).

## Ethos of Girlfridayz

### Diversity and inclusion

As a Diversity Assured organisation, Girlfridayz continually monitors diversity internally through our customer's database. We run regular reports to highlight any underrepresentation, and if so we immediately agree on action points address the imbalance.

At Girlfridayz, we pride ourselves on our people and our diverse workforce. Our mission is to deliver excellence to individuals, businesses, and communities. To help them achieve their goals, we recruit individuals from a diverse range of backgrounds and experience, enhancing the service we provide to a variety of industries.

Collaboration is one of our key company values and it is that collaboration which enables us to continue to grow and, in the future, become one of the leading marketing business consultancy, website designer, and backup admin in the industry of remote businesses trading mainly online using modern technologies available to communicate with:

- customers
- partners
- associate
- suppliers
- contractor
- Volunteers

Diversity and inclusion matter and it is important to Girlfridayz and we promote that throughout our work. It represents the inclusion of people from all backgrounds, roles, levels, and areas of expertise; adding to the continued growth and success of Girlfridayz, nurturing our talent and enabling us to strive for excellence in what we deliver.



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### Girlfridayz strategy

**Encouraging:** Diversity - We encourage diversity through our work with customers and community local church, providing the most suitable individuals for the roles available. Also helping our customers to realise their potential and achieve greater in their businesses with our moto you grow and we grow, with the following mantra let's do thing together, do not be afraid to be you, listen and learn and be consistent, persistent, focus on what you need to do to succeed.

**Measuring:** Diversity - Girlfridayz participates in the Equality Assured Program to enhance and develop our current processes and strategies and strives to use new and innovative ways to continue promoting equal opportunities for all with our vision solid and clear to us as we cherish the ideal of businesses working together in harmony and equal opportunities regardless of their size in a free society where the concept of market share and support for one another is present.

**Developing:** Understanding of Diversity – In order to embed the importance of diversity and inclusion into our business, we deliver in-house training on equal opportunities to our new starters and as refreshers for all employee(s). This includes what equal opportunities means to us as a business and in the day-to-day running of Girlfridayz with our short marketing courses the beginner marketing course and advanced marketing course solely created for other to learn marketing.

**Recruiting & Selecting:** Diversity - Our recruitment & selection processes are competency based. We might be in the future using a third-party company to handle recruitment including reference checks, skill evaluation, preliminary interviewing and screening of all employees for clients.

**Promoting:** Diversity - Through a partnership with our local or other communities, businesses, and the local church, also we network with a range of communities and offer opportunities through their Trainee Program.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. Girlfridayz has always been against slave market and embraced the section 54 of the Modern Slavery Act 2015 and having a background of work ethic in Health and Social Care and Support for the vulnerable people in our society for 15yrs, encouraging them to be empowered in their chosen community with love and support it is only right that this statement be part of our ethos.

Girlfridayz is an online company providing marketing services to Sole Traders and SME's which include digital marketing, traditional marketing, social media marketing, print marketing not withstanding but including website design and back up admin. Our business support and advice stretch from supporting our local area and further afield nationwide with a plan to penetrate



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oversea and provide our services to the country of our choice as our website view stretch as far as the United State, India, Canada and other countries.

However, we still recognise that there is scope for modern slavery to occur and our risk of modern slavery in our organisation will be kept under review as we operate a zero tolerance to modern slavery and human trafficking.

We expect all those suppliers in our supply chain to comply with our values. If a supplier is found to be demonstrating unacceptable practices they will be reported to the appropriate authorities and ultimately trading with this supplier would cease.

At Girlfridayz we are committed to implementing and enforcing effective systems and controls to seek to ensure that modern slavery is not taking place anywhere in our business or supply chains.

We will continually review our existing procedures and supply chain for compliance. This will determine the associated risk, detection and prevention of modern day slavery and human trafficking within our supply chain for products and services to the organisation.

## **Data Protection and Confidentiality Policy**

### **Scope**

The 1998 Data Protection Act came into force on 1 March 2000. The purpose of the Act is to protect the rights of individuals about whom data (information) is obtained, stored, processed and disclosed.

### **What is data protection?**

Data protection is essentially that area of the law that governs what may, and what may not be done with personal information. Such personal information may be in electronic (e.g. stored on computer hard drive) or manual form (in a manual filing system). Please refer to the cookie policy for guidance and if you would like to view your file store in our filing cabinet please contact us to arrange an appointment for that effect. Girlfridayz usually provides a copy of work carried or service agreement returned to us with your signature, date and name, invoices and any other update via email or correspondence to our customers and the same information is kept on file.

### **The law**

The Data Protection Act is mandatory and Girlfridayz is therefore required under law to comply with the Act. This means that Girlfridayz must:

- Notify any law centre or citizen advice bureau



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- Adhere to the eight data protection principles below
- Educate and train staff in the correct use of data

### **Consequences of breaching the Data Protection Act:**

- Girlfridayz customers, partners, staff, associate or third party can be criminally liable if they knowingly or recklessly disclose personal data in breach of the Act.
- At Girlfridayz we take seriously breach of data protection and it is also a disciplinary offense and will be dealt with under Girlfridayz complaint procedures and Girlfridayz may refer the breach to a law centre, citizen advice bureau which would notify the Information Commissioner of the types of processing they would undertake on behalf of Girlfridayz.

### **Policy Statement**

Girlfridayz is committed to fulfilling its legal obligations within the provisions of the Data Protection Act and has a cookie policy and privacy policy in force.

### **The Eight Data Protection principles**

Girlfridayz abides by and respects the eight principles of data (information) processing with which the data controller must ensure compliance. In this instance, Girlfridayz is the 'data controller'.

### **Personal data shall be:**

**Principle 1:** processed fairly and lawfully

**Principle 2:** obtained only for the purpose stated

**Principle 3:** adequate, relevant and not excessive

**Principle 4:** accurate and, where necessary, kept up-to-date

**Principle 5:** not be kept for longer than is necessary for that purpose

**Principle 6:** processed in accordance with the rights of data subjects under the Act

**Principle 7:** appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data

**Principle 8:** not transferred to countries without adequate protection

### **6. Compliance with data protection principles**

#### **Principle 1: Processed fairly and lawfully**

This means that when Girlfridayz is collecting personal information from individuals:

Reviewed on the 12-08-16 & 20/12/16 – reviewed on the 14-05-18 & 22-07-18

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- that they are made aware of the uses of this information
- individual consent has been obtained for any secondary uses of their personal information
- individuals are made aware of disclosures of their personal information to third parties.

### Information held by Girlfridayz includes details on the following:

- Customer
- personnel
- applicants for recruitment and selection
- training participants
- mailing lists
- Sensitive personal information

### The Data Protection Act introduces categories of sensitive personal information as to an individual's:

- Racial or ethnic origin
- Political opinion
- Religious beliefs or other beliefs of a similar nature
- Trade union membership
- Physical or mental health condition
- Sexual life
- Criminal or alleged offenses
- Criminal proceedings, convictions or disposal of proceedings

### Girlfridayz processes sensitive data for the following purposes:

- Advice/legal proceedings
- Employment law obligations
- Vital interests of the data subject
- Legal rights
- Insurance and pensions

### Principle 2: Obtained only for the purpose stated

Personal information can only be obtained for one or more specified and lawful purposes and should not be processed in any manner incompatible with those purposes.



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- Staff administration
- Administration of membership records
- Fundraising
- Realising the objectives of a charitable organization or voluntary body

### Principle 3: Adequate, relevant and not excessive

Girlfridayz will only hold personal information which is adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed. This means that the minimum of personal information should be held in order to fulfill its purpose. It is not acceptable to hold information on the basis that it might be useful in the future without a view of how it will be used. Girlfridayz has a responsibility to continually monitor compliance with this principle and to audit what information is kept.

### Principle 4: Accurate and, where necessary, kept up-to-date

This principle places a duty on Girlfridayz to take reasonable steps to ensure the accuracy of the information processed on Girlfridayz database.

- In collecting information Girlfridayz needs to take all reasonable steps to make sure the information is correct and the source of the information is reliable and to check this, if necessary.
- Similarly, third parties who supply information or attend a meeting held by Girlfridayz or customers of Girlfridayz to Girlfridayz should advise Girlfridayz of any corrections or amendments that need to be made.
- The significance of the inaccuracy is important, obviously minor inaccuracies which have no impact are of less importance but nevertheless the validity of the data provided should be checked.
- Any inaccuracies should be corrected as soon as possible in order to limit the damage and distress caused.
- Any information should include the source and date and any alterations should be dated.

### Principle 5: Not kept longer than is necessary

Girlfridayz will ensure that personal information is not retained any longer than is necessary. This will require Girlfridayz to undertake regular assessment and deletion. Hence Girlfridayz will keep your information on file for as long as the life of our work with you and thereafter we will keep your file in storage for a duration of 10 yrs. which thereafter will be destroyed.



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***Girlfridayz are legally obliged to keep customer files and financial records for a period of 6 years***

### **Principle 6: Processed in accordance with the rights of data subjects under the Act**

Customers have a general right of access to their own personal information, which is processed by Girlfridayz in accordance with established Girlfridayz procedures. They have the right:

- To have a copy of the information
- To stop processing where this is likely to cause distress
- To have information rectified, blocked or erased
- Claim compensation

**Principle 7:** Appropriate technical and organizational measures shall be taken against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. Girlfridayz has a duty to ensure that appropriate security measures are in place when handling personal information. This applies to both information technology and manual files.

Considering the new GDPR and the new Data Protection Directive as the GDPR also brings a new set of "digital rights" for EU citizens in an age of an increase of the economic value of personal data in the digital economy, at Girlfridayz we updated our Privacy and Cookies policy to be in line with the law.

### **The lawful basis for processing under the GDPR coming in force on the 25-05-18**

- Girlfridayz will not be requesting any data or processed your data unless there is at least one lawful basis to do so:
- Girlfridayz will ensure that consent has been granted by the data subject to the processing of personal data for one or more specific purposes.
- Girlfridayz processing of customers data is necessary for the performance of a contract held with us to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract.
- Girlfridayz will only process your data as necessary for compliance with a legal obligation to which the controller is subject.
- Girlfridayz will only process your data as necessary to protect the vital interests of the data subject or of another natural person.
- Girlfridayz will only process your data as necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.





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- Processing your data is necessary for the purposes of the legitimate interests pursued by the controller Girlfridayz or by a third party unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data, if the data subject is a child and Girlfridayz will abide by this rule.

### Consent

If consent is used as the lawful basis for processing, consent must be explicit for data collected and the purposes data is used for as defined in Article 7; defined in Article 4. Girlfridayz does not work with children, therefore, will not be seeking consent for children or their parent.

Girlfridayz has a consent form which allowed the customers to withdraw or withhold consent if they wish too and you have access to it via our disclosure policy.

Girlfridayz does not record our customers and welcomes this change in the law. The area of GDPR consent has several implications for businesses who record calls as a matter of practice. The typical “**calls are recorded for training and security purposes**” warnings will no longer be sufficient to gain assumed consent to record calls. Additionally, when recording has commenced, should the caller withdraw their consent then the agent receiving the call must somehow be able to stop a previously started recording and ensure the recording does not get stored.

If we need at someone point of our business to record our conversation with customers, we will seek your consent in writing to ensure compliance with the GDPR and recording is explicitly discussed in our disclosure policy.

### Right of access

The right of access (Article 15) is a data subject right. It gives citizens the right to access their personal data and information about how this personal data is being processed. Girlfridayz will provide, upon request, an overview of the categories of data that are being processed as well as a copy of the actual data. Furthermore, Girlfridayz will inform the data subject on details about the processing, such as the purposes of the processing with whom the data is shared, and how it acquired the data.

### Right to erasure

A right to be forgotten was replaced by a more limited right of erasure in the version of the GDPR that was adopted by the European Parliament in March 2014. Article 17 provides that the data subject has the right to request erasure of personal data related to them on any one grounds,

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including noncompliance with Article 6(1) (lawfulness) that includes a case (f) if the legitimate interests of the controller is overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data. Girlfridayz will abide by this rule.

### Glossary

**Data:** means information in a form in which it can be processed (automatically)

**Personal data:** means data relating to a living individual who can be identified either from the data or from the data in conjunction with other information in the possession of the data controller

**Data controller:** is a person who, either alone or with others, controls the contents and use of personal data

**Data processor:** is a person who processes personal data on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of his/her employment

**Data subject:** the individual person who is the subject of any relevant personal data (information)

**A personal data-filing system:** any structured set of personal data accessible according to specific criteria whether centralised, decentralised or dispersed on a functional or geographical basis

**Third party:** someone other than the data subject, controller, processor and persons with the authority of the controller or processor to process the data

**The recipient** is the person to whom data is disclosed. This would include employees, community, supplier, third parties, friend, and family. The data subject has to be informed of the recipients of the data.

**Data subject's consent** means any freely given specific and informed indication of his/her wishes by which the data subject signifies his agreement to personal data to him/her being processed. Consent may need further clarification **e.g.** should it be in some permanent form, it can be electronic, in writing or oral consent.