

*Last Updated: [18/10/2023]*

## **1. Introduction**

This Data Policy outlines the principles and practices followed by [Your Company Name] ("we," "us," or "our") concerning the collection, processing, and storage of personal data obtained during lead collection activities in the European Economic Area (EEA). This policy is designed to ensure compliance with the General Data Protection Regulation (GDPR) and other relevant data protection laws applicable in the EEA.

## **2. Data Collection**

**2.1 Lawful Basis for Processing:** We will only collect and process personal data where we have a lawful basis to do so. This includes obtaining explicit consent, fulfilling contractual obligations, complying with legal requirements, protecting vital interests, performing a task carried out in the public interest or in the exercise of official authority, and pursuing legitimate interests, provided they do not override the rights and freedoms of the data subjects.

**2.2 Purpose Limitation:** Personal data collected will only be used for the specific purposes for which it was collected, and we will inform individuals of these purposes at the time of data collection.

**2.3 Minimization:** We will only collect personal data that is necessary for the intended purpose and will not process excessive information.

## **3. Consent**

**3.1 Explicit Consent:** Where required by law, we will obtain explicit consent from individuals before collecting and processing their personal data. Consent will be freely given, specific, informed, and unambiguous.

**3.2 Withdrawal of Consent:** Individuals have the right to withdraw their consent at any time. Withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

## **4. Data Security**

**4.1 Security Measures:** We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including encryption, access controls, and regular security assessments.

**4.2 Data Breach Response:** In the event of a data breach, we will promptly assess the risk to individuals' rights and freedoms and, if necessary, notify the appropriate supervisory authority and affected individuals.

## **5. Data Subject Rights**

**5.1 Access and Rectification:** Individuals have the right to access their personal data and request corrections or updates.

**5.2 Erasure:** Individuals have the right to request the erasure of their personal data under certain circumstances.

**5.3 Data Portability:** Upon request, individuals have the right to receive their personal data in a structured, commonly used, and machine-readable format.

## **6. Data Retention**

**6.1 Retention Period:** Personal data will be retained only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by law.

## **7. Data Transfers**

**7.1 International Transfers:** If personal data is transferred outside the EEA, we will ensure that appropriate safeguards are in place, such as Standard Contractual Clauses or other lawful transfer mechanisms.

## **8. Accountability**

**8.1 Data Protection Procedures:** We regularly update our policy to meet the necessary criteria of data protection laws.

**8.2 Training and Awareness:** Our staff undergo regular training to ensure awareness of data protection principles and compliance requirements.

## **9. Contact Information**

For questions or concerns regarding this EEA Compliance Data Policy, please contact us at [admin@victoryconsultancy.co.uk](mailto:admin@victoryconsultancy.co.uk).

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