Dr Laura Shepherd

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Practicing from: Dronfield Health and Therapy Clinic, 24 High St, Dronfield, S18 1PY

# Security Policy

1. This security policy is designed to ensure that I comply with the security requirements of the General Data Protection Regulation, and the rights to privacy of data subjects are protected.
2. In compliance with Article 32 I have implemented appropriate physical, organisational and technical measures to ensure a level of security appropriate to the risk.
3. I am a sole trader with no employees. I work from home and the Dronfield Health and Therapy Clinic, 24 High Street, Dronfield, Derbyshire, S18 1WD. There is no physical office for the company.

**Security measures**

1. The following security measures have been taken:

**Physical**

* All hard copy material is stored in locked filing cabinets, with restricted access;
* The clinic where post is received is alarmed;
* Electronic devices are arranged so they cannot be viewed by casual passersby, particularly visitors;
* Electronic special category data is encrypted with restricted access;
* Transportable USB memory sticks are encrypted and stored in a lockable filing cabinet with restricted access;
* Electronic data is backed up off site;
* No data is stored on laptops;
* Computers and other electronic equipment are disposed of in a safe manner by an outsourced and certificated provider.

5. **Managerial**

* This policy is regularly reviewed and Dr Laura Shepherd is committed to ensuring it is implemented;
* Dr Laura Shepherd is responsible for data protection and other data protection policies;
* Dr Laura Shepherd has sufficient resources to carry out its role effectively as data protection lead;
* Breach of this security policy is a disciplinary offence.

6. **Technical measures**

* Anti-virus and anti-spyware tools are installed on all computers and laptops;
* All computers, including laptops and mobile phones, are encrypted/password protected;
* Personal data is encrypted before it is uploaded onto the cloud;
* Personal data shared by email are encrypted and password protected as appropriate;

7. Security measures are tested and evaluated once a year;

8. Whenever a new project, process or procedure is introduced which carries a high risk to data subjects, a Data Protection Impact Assessment is carried out, at the instigation ofDr Laura Shepherd.