

**G4 MARKETING GROUP**

**DATA PROTECTION**

**POLICY**

## 1.0 Document Control

Name	Role	Date	Version
Alfred	Infosec Manager	April	3.0

### Document History

Author	Date	Version	Comment
Robin	14/04/2024	1.0	continual improvement and update to standard
Robin	15/04/2024	2.0	Transformation changed to ICT. PCER added
Robin	16/04/2024	3.0	No changes

### Document Information

#### DOCUMENT REVIEW / APPROVAL

	NAME	DESIGNATION	SIGNATURE	DATE
Reviewed by:	Bruce Wayne	Chief Information Security Officer	Bruce Wayne	14/04/2024
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## 2.0 Introduction

G4 Marketing Group recognizes the importance of protecting the privacy and security of personal data entrusted to us by clients, partners, and website users. This Data Protection Policy outlines our commitment to data privacy and adherence to relevant regulations.

## 3.0 Scope

This policy applies to all employees, contractors, and temporary workers of G4 Marketing Group who handle personal data in any form, including electronic and paper records.

## 4.0 Executive Summary

This policy ensures:

### 4.1 Transparency and Accountability

We are transparent about how we collect, use, and store personal data. We are accountable for safeguarding this data and complying with data protection regulations.

### 4.2 Lawful Basis for Processing

We only collect and process personal data with a lawful basis, such as consent, contractual necessity, or legitimate interests.

### 4.3 Data Minimization

We only collect and retain personal data that is necessary for specific, legitimate purposes.

### 4.4 Data Security

We implement appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, or destruction.

### 4.5 Individual Rights

We respect the rights of individuals regarding their personal data, including the right to access, rectify, erase, and restrict processing.

By adhering to these principles, G4 Marketing Group builds trust with clients and partners and ensures responsible data handling practices.

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## 5.0 Policy

### 5.1 Data Collection

- We will only collect personal data for legitimate business purposes and clearly communicate these purposes to individuals at the point of collection.
- We will obtain explicit consent from individuals before collecting and processing their personal data for marketing purposes.
- We will limit the collection of personal data to what is necessary and relevant for the intended purpose.

### 5.2 Data Storage and Security

- We will implement appropriate technical and organizational security measures to protect personal data from unauthorized access, disclosure, alteration, or destruction. This includes data encryption, access controls, and regular security assessments.
- We will only store personal data for as long as necessary for the intended purpose or as required by law. We will securely dispose of outdated data using approved methods.

### 5.3 Data Sharing and Disclosure

- We will only share personal data with third-party vendors or service providers with a legitimate need to access the data for performing services on our behalf. We will enter into strict contractual agreements with any third parties that ensure the security and confidentiality of personal data.
- We will not disclose personal data to any unauthorized third party without explicit consent from the individual.
- We may disclose personal data if required to do so by law or in response to a legitimate legal request.

### 5.4 Individual Rights

- We will respect the rights of individuals regarding their personal data as outlined in relevant data protection regulations (e.g., GDPR, PCER). This includes the right to:
  - Access: Individuals have the right to request a copy of their personal data held by G4 Marketing Group.
  - Rectification: Individuals have the right to request the correction of any inaccurate or incomplete personal data.

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- Erasure: Individuals have the right to request the deletion of their personal data under certain circumstances.
- Restriction of Processing: Individuals have the right to restrict the processing of their personal data.
- Objection: Individuals have the right to object to the processing of their personal data for marketing purposes.
- We will provide individuals with clear and easily accessible mechanisms to exercise their data protection rights.

## 6.0 Prohibited Use

- Collecting or processing personal data without a lawful basis.
- Sharing personal data with unauthorized third parties.
- Failing to implement appropriate security measures to protect personal data.
- Retaining personal data for longer than necessary.
- Failing to respond to requests from individuals regarding their personal data in a timely manner.

## 7.0 ISO 27002:2022 Mapping

This policy aligns with the following ISO 27002:2022 domains and sub-domains:

- Domain: Information security management system (A.5)
- Sub-domain: Information security policies (A.5.1)
- Domain: Asset security (A.8)
- Sub-domain: Information classification and labeling (A.8.2)
- Domain: Access control (A.9)
- Sub-domain: User access management (A.9.2)
- Domain: Information security incident management (A.16)
- Sub-domain: Personal data breach management (A.16.1.3) - This sub-domain specifically addresses the reporting requirements for personal data breaches.

## 8.0 Policy Compliance

All personnel involved in handling personal data at G4 Marketing Group are responsible for adhering to this policy. Violations may result in disciplinary action, up to and including termination of employment.

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## 9.0 Regulatory Requirements

This policy considers relevant data protection regulations, such as the General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Regulations (PECR). It ensures G4 Marketing Group operates within legal boundaries and protects the privacy rights of individuals.

## 10.0 Marketing Context

This policy is tailored to G4 Marketing Group's marketing environment by:

- Emphasizing the importance of data privacy when collecting and using personal data for marketing purposes, particularly for clients from regulated agencies.
- Highlighting the need for documented procedures for handling data subject requests (e.g., access, rectification, erasure) as mandated by regulations like GDPR.
- Specifying data retention periods for marketing data that comply with regulatory requirements and minimize the risk of data breaches.

By adhering to these considerations, G4 Marketing Group demonstrates its commitment to responsible data practices and builds trust with clients in the digital marketing landscape.

## 11.0 Policy Compliance Framework Snapshot

### 11.1 Incident Management

Clear procedures will be established for identifying, reporting, and managing data security incidents. This will include a process for notifying affected individuals and regulatory authorities in case of a personal data breach.

### 11.2 Data Inventory and Risk Assessment

A comprehensive data inventory will be created to identify all personal data collected and stored by G4 Marketing Group. A data risk assessment will be conducted to evaluate potential threats and vulnerabilities to personal data.

## 12.0 Recommendations for Successful Implementation

### 12.1 Regular Reviews and Updates

Regularly review the Data Protection Policy to ensure it remains aligned with evolving regulations and best practices. Update the policy and communicate any changes to personnel accordingly.

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## 12.2 Promote a Culture of Privacy

Foster a culture of privacy awareness within G4 Marketing Group. This includes encouraging employees to report any privacy concerns and emphasizing the importance of data protection.

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