

## ACORUS RURAL PROPERTY SERVICES LIMITED (“ACORUS”)

### PRIVACY POLICY

#### Statement of commitment

- Acorus is committed to maintaining control of personal and confidential commercial information at all times.
- Acorus operates an information management system to manage and monitor information security, whether held in electronic, paper or other medium.

#### Personal information

- Personal information is managed in compliance with the EU General Data Protection Regulation (GDPR) and any other relevant legal requirement.
- Acorus will keep personal information confidential except where disclosure is required by law.
- Personal information will be retained for as long as Acorus considers necessary or the law requires, whichever is longer.
- Acorus will not sell, rent or lease email addresses or other personal information to third parties.
- Employee’s rights and responsibilities regarding their data are set out in a Privacy Notice which is not publicly available.

#### Employee confidentiality obligation

- It is an obligation of their contract of employment that Acorus staff will not during or at any time after termination disclose to any person, firm, company or organisation any confidential information.
- Confidential information includes but is not limited to customer names, fee rates, product pricing, results of research, policies, standards and procedures belonging to Acorus, its clients or relating to their affairs or dealings, which may come to the employee’s knowledge during their employment.
- Confidentiality obligations for employees of Acorus are set out in an internal Staff Handbook (not publicly available).

#### Client confidential commercial information

- Confidentiality is covered in Acorus’ standard contractual terms and conditions which are available on the company’s website - [www.acorus.co.uk](http://www.acorus.co.uk)
- The terms and conditions state that Acorus will treat as confidential all trade secrets and confidential information received from the client concerning the client or its business.
- Where correspondence with the client is via the internet, email or other electronic media, Acorus will take reasonable steps to safeguard the security of information transmitted but will not accept liability for its security and confidentiality beyond these steps.

## **Suppliers and sub-contractors**

- The protection of confidential information is covered in standard arrangements for the provision of supplies or sub-contracted services.
- This normally includes provision of relevant Privacy Notices to Acorus by the supplier or sub-contractor.

## **Website**

- We only collect identifiable information that is specifically and voluntarily provided by a visitor to our website, for example in making an inquiry about Acorus' services.
- Generally, this includes name, email address, postal address, telephone number and other similar contact information.
- Any personal data supplied to Acorus will be used solely for the purpose indicated on the web page requesting the information.
- A Privacy Notice will be placed on the website with more detailed information about protection of data supplied to Acorus through this medium.

## **Data breaches and complaints**

- Data breaches and privacy related violations of this policy discovered by Acorus will be investigated by the company's Operations Director.
- Acorus will maintain a Register of Data Breaches and notify the Information Commissioner's Office in the event of a serious violation of the GDPR.
- Corrective actions will be taken to resolve the violation and where appropriate, preventative actions taken to minimise the risk of reoccurrence.
- Complaints from clients and third parties will be managed in accordance with Acorus' Complaints Handling Procedure, available on the company's website – [www.acorus.co.uk](http://www.acorus.co.uk).

## **Responsibilities**

Acorus is committed to the implementation of this policy, for which I take full responsibility.

This policy and the related Privacy Notices will be periodically reviewed so that they continue to be lawful, effective and relevant to the company's business.

## **Brian Barrow**

Managing Director

Acorus Rural Property Services Limited

June 2018