

POLICY AE

CLIENT DATA MANAGEMENT POLICY

Purpose

This Policy is designed to provide an overview for retrieval, archiving and destruction of client records held by Cognisco and to ensure that they are held in line with the relevant legislation and codes of practice. A separate policy is in place for non-client records.

Principles

Personal data for client's employees should be held in SharePoint in the client 'J Drive' location prior to being loaded into the client My*KNOW system.

Developers using local copies of data should ensure that the data has been processed and is anonymous.

Data Archiving

Clients may purchase data archiving services from Cognisco.

Data is retained within the boundaries of the United Kingdom.

Archived data is retained within a single archiving system.

Copies of data may be retained on other authorised Cognisco systems for the purpose of future operational use. All copies will be destroyed upon termination of the data archiving agreement.

Process for Archiving

To archive data the following steps are to be followed:

1. Mark data as ready for archiving and add to the change control notice.
2. Circulate the change control notice for review and sign-off.
3. Dump to archive medium. Verify the data as it is transferred, updating the disk record.
4. Read archived data and list it.
5. Place one copy in a fireproof safe or off site.
6. Remove the archived data from the disk.
7. Update the archive index.
8. Update the data retention schedule on the 'Data' calendar.

Data Destruction

Process for Destruction

It is the responsibility of the client Lead Consultant to issue a notice to destroy data. The notice will be created as an internal support request case on the corporate CRM system. A copy of the notice will be sent to the manager of each department and the nominated sales person.

To destroy data the following steps are to be followed:

1. Draw up a list of data items for deletion.
2. Create an anonymous copy of the data for retention and used by Cognisco.
3. Mark data for destruction and add to the change control notice.
4. Circulate the change control notice for review and sign-off.
5. Execute data destruction technique (as per the Cognisco policy).
6. Attempt recovery by technical inspection and documented recovery techniques.
7. Verify destruction of data.
8. Record destruction event on the 'Data' calendar.
9. Issue data destruction notification to client. (*Letter templates below*)

Disposal of Equipment

The following table is not an exhaustive list of all possible media types, but instead offers a representative sample of the most common forms of media currently in use. These media types also demonstrate the characteristics that determine the appropriate deletion or destruction methods required to assure data is non-retrievable.

Media Type	Data Storage Mechanism	Suggested Removal Methods
Hard Disk Drives	Non-volatile magnetic	Pattern wiping, Incineration
CDROM/DVD-R	Write once optical	Abrasion, Incineration
CD-RW/DVD-RW	Write many optical	Abrasion, Incineration
Magnetic Tape	Non-volatile magnetic	Degaussing, Incineration
Flash Disk Drives	Solid state	Pattern wiping, Physical destruction
Paper Based	Locked cabinet	Shredding, Incineration

Removal of Data from Site and Remote Access

Client data will not be removed from site except in exceptional circumstances and only with the written permission of the Data Protection Officer and the client.

The Domain Administrators, as agreed by the Data Protection Officer, will be allowed remote access. The list of Domain Administrators will be reviewed every 3 months by the Data Protection Officer.

Remote working may be permitted in exceptional circumstances for other employees, but only after consultation with the client and written authorisation from the Data Protection Officer.

Please also see section 4.4 of the Sub-contractor Policy.

Anonymous Data

On occasions Cognisco may be permitted to retain a version of a client's assessment results which have been made anonymous. This means that no data can be identified as belonging to any specific individual/employee.

It must not be possible to identify the organisation or any individual by combining separate pieces of information held by Cognisco.

All references to identifiable data must be replaced with a 'type' or randomised name. For example, the client name should be changed to 'UK International Bank 2'. A Job Title must be changed to remove specific references e.g. "Head of Retail Banking (HBSC)" would change to just "Director" or "Head of Department".

The following information data should be subject to this process if the client has agreed in writing to the process:

- Organisation Name
- Project Name
- Programme Name
- Module Name
- Topic Name
- Question Stem/Response
- User Login Name, Password, First Name, Surname, Job Title
- Group Names
- Database Name
- Network Folder Name

Following the process to ensure all retained data is anonymous, and the destruction of all other data is completed an audit will be undertaken by a suitably trained member of staff.

Letters to be sent to Clients

These standard letters should be sent to clients by the Account Manager in consultation with the Data Protection Officer. The letters must be sent out in time for the client to consider their options within the 90 day timeframe for the destruction of data.

If no response has been received within 60 calendar days the Account Manager must re-send the letter stating it is a copy and that no response has been received.

(Data Retention / Destruction template)

Dear XXXXXX

I am writing to you in regard to data held on your behalf by Cognisco and to present the options you now have to retain, extract or destroy the data collected. This is being carried out in accordance with current UK Data Protection legislation.

Following the end of your contract, you have one month to exercise one or more of the following options. If a decision is not reached by that time then all identifiable data relating to your organisation will be irretrievably destroyed.

The following options are available to you:

Read only service

Cognisco will retain a read only version of the system including the My*KNOW application for a single user account to access the system on a read only basis.

Cost: Set up £XXXX and then £XXXX / month payable quarterly in advance.

Data Export

Cognisco will provide a onetime data export of all user, assessment and competency data as a set of csv files on request from the client.

Cost £XXXX

Data Retention

Cognisco will undertake to retain a non-operational copy of assessment, competency and/or training data on its systems. This will allow you to utilise this information for future decisions, training requirements or for auditing purposes. Data will be encrypted and stored in our UK Microsoft Azure Cloud Service.

Cost: Set up £XXXX, Storage £XXX / month payable quarterly in advance.

Data Extracts

For retained data, Cognisco will supply data extracts on request, the options are:

1. Extract report creation (in a format to be agreed) of the relevant information stored in the system on an employee basis.
Cost: £XXXXXX
2. Extract request - To provide an extract we will retrieve the data from storage, resurrect the database in a readable form and then run the extract report for the given users and then decommission the temporary environment.
Cost: £XXXXXX plus £XXX per user extracted

Data Destruction

Cognisco will securely destroy all data identifiable as relating to your organisation. A certificate will be provided verifying the completion of this activity.

Cost: £XXXXXX

If you have any questions about these options, or the surrounding processes or would like a quotation please do not hesitate to contact me.

I look forward to hearing from you.

<Insert Sign-off>

<Insert Author Name>

Letter for the Certification of the Destruction of Data

Date: xx-xxx-xxx

Ref: xxxxxxxxxxxx

Dear xxxxxx,

This letter of certification is provided to xxxxxx, as it pertains to the destruction and disposal of data. Cognisco Ltd acknowledges that all data held has been destroyed. All data is eradicated on all forms of media regardless of whether the media is usable or not.

Cognisco Ltd guarantees all information held is now irretrievable.

Sincerely

Name

Title