

Confidentiality policy for staff

When clients book an event with Nyama Catering Ltd, clients provide us with personal information about them on the understanding that we keep this information confidential and that it will not be divulged without the client's consent. Most clients would most likely be reluctant to provide personal information if they believed it would be passed on.

In addition to the company's systems for storing this information securely, each member of staff is under a strict duty to maintain the confidentiality of all personal information held by the company.

The duty of confidentiality

Your contact of employment or contracts for services at the company require you to maintain the confidentiality of client information. A breach of this requirement, could end your employment with the company or contract for services.

A breach of confidentiality, may lead to an investigation by the IOC; individuals are responsible for their professional conduct. A client may also bring legal action for damages.

Company directors may also be prosecuted for breaching statutory data protection requirements.

Personal information

A client's personal information includes:

- The client's name, current and previous address, bank account/credit card details, telephone numbers, email address and other means of personal identification
- Information about family members and personal circumstances supplied by the client
- The amount that was paid for services, the amount owing or the fact that the client is a debtor to the practice.
- Any photos of the venue or address of the client and or their event

Principles of confidentiality

Personal information about a client is confidential to the client and to those providing the client with the company's service or who require the information to fulfil our service.

Disclosures to third parties

You must not disclose personal information to third parties without the consent of the client, unless it is required by law or the company pursuing a bona fide legal claim against



the client, the information is required by a solicitor, court or debt-collecting agency. The responsibility for disclosure rests with the responsible Processor; other members of the team cannot take the decision to disclose.

Disclosure to government agencies

It may be right to disclose personal information without consent to government agencies, including HMRC or the police. In all cases, you should obtain details of what information is needed and why. Only information that it is necessary to comply with the law should be disclosed. You must always obtain professional advice before releasing information on these grounds.

Privacy notices

The company's privacy notices for clients, employees describe the personal information that we collect, how we use it and how we store it safely and securely. Copies of the notices are available from Johannes Burger.

If you collect, use, store or destroy personal information, you should be familiar with the relevant privacy notice and ensure that you are dealing with the personal information as described in the notice

Access to records

Clients can request access to their records. The Processor can discuss the records with the client and the client's identity must be checked and confirmed.

The copy of the record must be supplied within one month of the request.

Clients must make a written request for access to their records. No fee is payable (except if a client makes multiple requests)

Everyone involved with recording information about the client's event must ensure that records are:

- Contemporaneous and dated
- Accurate and comprehensive
- Neat, legible
- Strictly necessary for the purpose
- Not derogatory
- Such that disclosure to the client would be unproblematic.

Client rights

Clients have the right to stop the company sending marketing emails and to ask the company to delete some information, such as contact details. Not all information can be deleted and requests to delete information must be managed in accordance with data protection laws. These requests must be passed to Johannes Burger for action.

Company rules

- Records/Data must be kept secure and in a location where it is not possible for individuals to read them
- Clients should not be able to see information contained in appointment books, day sheets or computer screens
- Discussions about clients must not take place in public areas
- When talking to a client on the telephone or in person in a public area, sensitive information must not be overheard by other individuals
- Demonstrations of the company's administrative/computer systems must not involve actual client information
- Client's records or other information must not be disclosed to police officers or HM Revenue and Customs officials without instruction by Johannes Burger.

Non-compliance

If, after investigation, we find that you have breached client confidentiality or have failed to follow this policy, you may be liable to summary dismissal in accordance with the company's disciplinary policy. A copy the disciplinary policy is available from Johannes Burger.

Upon termination of your employment or contract for services, you must respect the confidentiality of all personal information held by the company. You must not knowingly obtain or disclose personal information without the consent of Johannes Burger. If the company believes that you have done so, we will inform the Office of the Information Commissioner; you may, as a consequence, be prosecuted by the Commissioner or the Director of Public Prosecutions.

