

**Mr C Dawson BSc FRCS MS LLDip  
Consultant Urological Surgeon  
Trading as Chris Dawson Ltd**

Consulting Rooms  
Fitzwilliam Hospital  
Milton Way  
South Bretton  
Peterborough  
PE3 9BR

May 10, 2018

**Security Policy**

1. This security policy is designed to ensure that *Christopher Dawson* complies 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 *Christopher Dawson* has implemented appropriate physical, organisational and technical measures to ensure a level of security appropriate to the risk.
3. *Christopher Dawson* is based at 15 Thorpe Road, Peterborough, PE3 6AB.

**Security measures**

4. The following security measures have been taken:

**Physical**

- Office building is alarmed/protected by CCTV cameras;
- Visitors to premises are supervised at all times;
- Areas of the premises where personal data are kept are secured by locks/complex security codes;
- Computer screens are arranged so they cannot be viewed by casual passersby, particularly visitors;
- Hard copy material containing personal data is stored securely and locked away;

- Electronic special category data is encrypted with restricted access;
- Electronic data is backed up off site;
- Shredding of confidential information is carried out securely on site pursuant to a GDPR compliant contract;
- Mobile equipment such as laptops are encrypted and locked away when not in use;
- 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 Christopher Dawson is committed to ensuring it is implemented.
- Christopher Dawson is responsible for data protection and has powers to discipline for breaches of this and other data protection policies;
- Christopher Dawson has sufficient resources to carry out its role effectively as data protection lead;
- Staff are trained in data protection;
- Breach of this security policy is a disciplinary offence;

## 6. **Technical measures**

- Anti-virus and anti-spyware tools are installed on all computers;
- All computers are encrypted and password protected;
- It is a disciplinary offence to share a password;
- Computers are programmed to download patches automatically;
- Computers have automatic locking mechanisms when not in use;
- Computers, laptops, mobile phones, USB sticks and CDs are encrypted and 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 of Christopher Dawson.