



Security Policy Template – Formulate Psychology LLP

1. This security policy is designed to ensure that Formulate Psychology LLP 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 Formulate Psychology LLP has implemented appropriate physical, organisational and technical measures to ensure a level of security appropriate to the risk.

Security measures

3. The following security measures have been taken:

Physical

- Visitors to premises are supervised at all times;
- Hard copy material containing personal data is stored securely and locked away in fire proof;
- Filing cabinets at night;
- Hard copy special category data, such as medical records, are kept separately from other;
- Personal data in locked and fire proof cabinets with restricted access;
- 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 or outsourced pursuant to a GDPR compliant contract;
- Mobile equipment such as laptops are encrypted and locked away when not in use.
- Staff working off site must follow guidelines on the printing and disposal of hard copy material;
- 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 Formulate Psychology LLP is committed to ensuring it is implemented.
- Formulate Psychology LLP has sufficient resources to carry out its role effectively as data protection lead;
- Staff are trained in data protection;
- Only designated staff may delete data and they receive specific training in this regard;

6. Technical measures

- Anti-virus and anti-spyware tools are installed on all computers;
 - All computers are encrypted and password protected;
 - Computers are programmed to download patches automatically;
 - Computers have automatic locking mechanisms when not in use;
 - No data are transferred to USB memory sticks, cards or other drives;
 - Computers, laptops, mobile phones, USB sticks and CDs are encrypted and password protected;
 - Personal data is encrypted before it is uploaded onto the cloud;
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 Formulate Psychology LLP.