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Authorised: Graham Lewis	Effective date: 09/2021	Issue: 03

IP46 – Data Protection Policy

1. Introduction

This Policy sets out the obligations of Real Group Ltd. regarding data protection and the rights of anyone that the company holds personal data for, under the Data Protection Act 2018 (DPA), the Freedom of Information Act 2000 (FOIA), the United Kingdom General Data Protection Regulation (UK GDPR), and the Privacy and Electronic Communications Regulations (PECR); collectively referred to in this policy as “the Regulations” and are regulated by the Information Commissioner’s Office (ICO).

The Regulations define “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by Real Group, its employees, agents, contractors, interns, volunteers, or other parties working on behalf of Real Group.

Real Group is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, security of data and privacy of all individuals with whom it deals.

2. The Data Protection Principles

This Policy aims to ensure compliance with the Regulations. The Regulations set out the following principles with which any party handling personal data must comply. All personal data must be:

- processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;

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- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulations in order to safeguard the rights and freedoms of the data subject;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2.1 Lawful, Fair, and Transparent Data Processing

The Regulations seek to ensure that personal data is processed lawfully, fairly, and transparently; without adversely affecting the rights of the data subject. The Regulations state that processing of personal data shall be lawful if at least one of the following applies:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary to protect the vital interests of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

2.2 Processed for Specified, Explicit and Legitimate Purposes

- Real Group collects and processes the personal data set out in the company's Record of Processing Activities (ROPA). This includes personal data received directly from data subjects (for example, contact details used when a data subject communicates with us) and data received from third parties (for example, where a delegate on a course passes data to us about their line manager).
- Real Group only processes the personal data set out in the ROPA. The purposes for which we process personal data is communicated to data subjects at the time that their personal data is collected (by directing them to our Privacy Policies and Cookies and Electronic Tracking Policy on our websites), where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

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2.3. Adequate, Relevant and Limited Data Processing

Real Group will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under 2.2 above.

2.4. Accuracy of Data and Keeping Data Up to Date

Real Group shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at regular intervals thereafter. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

2.5. Timely Processing

Real Group shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase, anonymise or archive it without delay. How long personal data will be kept for and what will happen to it at the end of this period is outlined in the company's Retention Schedule.

2.6. Secure Processing

Real Group shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in the Privacy Policies, Data Breach and Incident Management Procedure, Information Security Policy, Information Classification Policy, Document and Record Control Policy, Access Control Policy, Information Security Incident Management policy, Supplier Security Policy, Data Subject Access Request Procedure and the Secure Disposal Policy.

3. Accountability

3.1) Data Manager

Graham Lewis of Real Group Ltd, 70-72 Stour Street, Canterbury, CT1 2NZ, United Kingdom.

3.2) Data Protection Officer

Mr. Tom Ziemiński of Equinox Ltd, Boscawen House, St. Stephen, St. Austell, PL26 7QF, United Kingdom.

3.3) Data Management Team

The Data Manager and Data Protection Officer are supported by a Data Management Team, which comprises senior staff from the company's Operations and IT teams.

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3.4) Internal Records

Real Group keeps a written internal record of processing activities, which shall incorporate the following information:

- A. the name and details of Real Group's Data Manager and Data Protection Officer, and key contacts/account managers for any applicable third parties;
- B. the purposes for which Real Group processes personal data;
- C. details of the categories of personal data processed; and the categories of data subject to which that personal data relates;
- D. details (and categories) of any third parties that will receive personal data from Real Group;
- E. details of any transfers of personal data outside of the UK, including all mechanisms and security safeguards;
- F. details of how long personal data will be retained; and
- G. detailed descriptions of all technical and organisational measures taken to ensure the security of personal data.

4. Privacy Impact Assessments

Real Group shall carry out Privacy Impact Assessments when and as required under the Regulations. Privacy Impact Assessments shall be overseen by our Data Manager and shall address the following areas of importance:

- A. the purpose(s) for which personal data is being processed and the processing operations to be carried out on that data;
- B. details of the legitimate interests being pursued;
- C. an assessment of the necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
- D. an assessment of the risks posed to individual data subjects; and
- E. details of the measures in place to minimise and handle risks including safeguards, data security, and other measures and mechanisms to ensure the protection of personal data, sufficient to demonstrate compliance with the Regulations.

5. Data Subject Rights

The Regulations set out the following rights applicable to data subjects:

- A. the right to be informed;
- B. the right of access;
- C. the right to rectification;
- D. the right to erasure (also known as the 'right to be forgotten');
- E. the right to restrict processing;
- F. the right to data portability;

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- G. the right to object;
- H. rights with respect to automated decision-making and profiling.

6. Keeping Data Subjects Informed

6.1) Privacy Policy

Real Group shall ensure that the following information is provided - by reference to its Privacy Policies - to every data subject when personal data is collected:

- A. details of Real Group including, but not limited to, the identity of its Data Protection Officer;
- B. the purpose(s) for which the personal data (as detailed in Part 15 of this Policy) is being collected and will be processed and the legal basis justifying that collection and processing;
- C. where applicable, the legitimate interests upon which Real Group is justifying its collection and processing of the personal data;
- D. where the personal data is to be transferred to one or more third parties, details of those parties;
- E. details of the length of time the personal data will be held by Real Group;
- F. details of the data subject's rights under the Regulations;
- G. details of the data subject's right to withdraw their consent to Real Group's processing of their personal data at any time;
- H. details of the data subject's right to complain to the Information Commissioner's Office (the 'supervisory authority' under the Regulations);
- I. where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it;
- J. details of any automated decision-making that will take place using the personal data (including but not limited to profiling), including information on how decisions will be made, the significance of those decisions and any consequences.

6.2) Notification Timing

The information set out above in Part 6.1 shall be provided to the data subject at the following applicable time:

- A. where the personal data is obtained from the data subject directly, at the time of collection (Links to our Privacy Policies on our website are available in the footer of all webpages and in the signature of all outbound emails;
- B. where the personal data is not obtained from the data subject directly and is not shared with Real Group as part of a data sharing agreement with another data controller:
 - I. if the personal data is used to communicate with the data subject, at the time of the first communication; or
 - II. in any event, not more than one month after the time at which Real Group obtains the personal data.

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7. Data Subject Access & Freedom of Information

7.1)

A data subject may make a subject access request at any time to find out more about the personal data which Real Group holds about them. Real Group is normally required to respond to requests within one month of receipt (this can be extended by up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension prior to the original one month deadline).

7.2)

All subject access requests received by any member of staff must immediately be notified to the Data Manager in-line with the Data Subject Access Request Procedure.

7.3)

Real Group does not charge a fee for the handling of normal requests. Real Group reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

7.4)

Real Group is not a public authority so generally the *Freedom of Information Act* does not apply. However, for certain courses and projects that are run in collaboration with public authorities the Act does apply in line with the Real Group Freedom of Information Act Request Procedure.

8. Rectification of Personal Data

8.1)

If a data subject informs Real Group that personal data held by the company is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject's notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension prior to the original one month deadline).

8.2)

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

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9. Erasure of Personal Data

9.1)

Data subjects may request that Real Group erases the personal data it holds about them in the following circumstances:

- A. it is no longer necessary for Real Group to hold that personal data with respect to the purpose for which it was originally collected or processed;
- B. the data subject wishes to withdraw their consent to Real Group holding and processing their personal data;
- C. the data subject objects to Real Group holding and processing their personal data (and there is no overriding legitimate interest to allow Real Group to continue doing so) (see Part 12 of this Policy for further details concerning data subjects' rights to object);
- D. the personal data has been processed unlawfully;
- E. the personal data needs to be erased in order for Real Group to comply with a particular legal obligation.

9.2)

Unless Real Group has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension prior to the original one month deadline). The person's details will be logged in the ICO Compliance Activity Log to make sure they will never be contacted again and also to demonstrate to the ICO that the 'Right to Erasure' has been upheld and actioned in a timely manner. Please see the Data Subject Erasure Request Procedure.

9.3)

In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

10. Restriction of Personal Data Processing

10.1)

Data subjects may request that Real Group ceases processing the personal data it holds about them. If a data subject makes such a request, Real Group shall retain in active systems only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place. The data subject's other personal data will be retained in an archived state until the restriction on processing has been lifted.

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10.2)

Real Group may refuse to comply with a request for a restriction of data processing if it is manifestly unfounded (including if it is clearly malicious in intent), or excessive.

10.3)

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

11. Data Portability

11.1)

Real Group processes most personal data using electronic means to protect the environment.

11.2)

Where data subjects have given their consent for Real Group to process their personal data in such a manner, or the processing is otherwise required for the performance of a contract between Real Group and the data subject, data subjects have the legal right under the Regulations to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other Data Managers, e.g. other organisations).

11.3)

To facilitate the right of data portability, Real Group shall make available all applicable personal data to data subjects in the following formats:

- A. CSV files;
- B. PDF files.

11.4)

Where technically feasible, if requested by a data subject, personal data shall be sent directly to another Data Manager.

11.5)

All requests for copies of personal data shall be complied with within one month of the data subject's request (this can be extended by up to two months in the case of complex or numerous requests, and in such cases the data subject shall be informed of the need for the extension prior to the original one month deadline).

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12. Objections to Personal Data Processing

12.1)

Data subjects have the right to object to Real Group processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling), and processing for scientific and/or historical research and statistics purposes.

12.2)

Where a data subject objects to Real Group processing their personal data, Real Group shall cease such processing forthwith; unless processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data; or the processing is necessary for the conduct of legal claims.

12.3)

Where a data subject objects to Real Group processing their personal data for direct marketing purposes, Real Group shall cease such processing forthwith.

12.4)

Where a data subject objects to Real Group processing their personal data for scientific and/or historical research and statistics purposes, Real Group must demonstrate strong grounds to be able to continue processing this data. Real Group is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

13. Automated Decision-Making

13.1)

In the event that Real Group uses personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on data subjects, data subjects have the right to challenge to such decisions under the Regulations, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from Real Group.

13.2)

The right described in Part 13.1 does not apply in the following circumstances:

- A. the decision is necessary for the entry into, or performance of, a contract between Real Group and the data subject;
- B. the decision is authorised by law; or

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C. the data subject has given their explicit consent.

14. Profiling

Where Real Group uses personal data for profiling purposes, the following shall apply:

- A. clear information explaining the profiling will be provided, including its significance and the likely consequences;
- B. appropriate mathematical or statistical procedures will be used;
- C. technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- D. all personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling. All of Real group's profiling activities are recorded on the Record of Processing Activities.

15. Personal Data

The following personal data may be processed for the legitimate interests of Real Group or a third party:

- Name
- Addresses
- Phone numbers
- E-mail addresses
- Place of work
- Teacher reference number, or other professional registration identification numbers
- Social media account details
- IP addresses and other similar electronic identifiers

The following personal data may be processed by Real Group to fulfil a contract with the individual, or to take steps before entering into a contract:

- Name
- Addresses
- Phone numbers
- E-mail addresses
- Place of work
- Date of birth
- Gender identity
- Sex
- Marital status

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- Ethnicity
- Nationality
- Disability details
- Sexual orientation
- Religion or belief details
- Pregnancy, maternity, paternity, or adoption details
- Criminal records information
- Teacher reference number, or other professional registration identification numbers
- Copies of photo ID and passports
- Copies of immigration documents
- Copies of marriage, divorce and name change certificates
- Copies of qualification certificates and transcripts
- Employment history and copies of CVs
- National Insurance Number
- Copies of P45/P46/P60 forms
- Marital status
- Education and training records
- Employment, character and professional references
- Medical and disability details, potentially including copies of medical documents
- Next of kin details
- Bank account and other payment-related details
- Circumstantial evidence and details volunteered to Real Group to support processes such as those relating to mitigating circumstances
- Social media account details
- Parental or guardian details
- IP addresses and other similar electronic identifiers
- Psychometric test results
- Unique identifiers assigned by Real Group, or our partners

The exact details collected will depend on a data subject's relationship with Real Group and for delegates can differ between different courses based on the requirements of the regulators and partners involved.

16. Data Protection Measures

RG shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data:

- all emails containing personal data must be encrypted;
- where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hard copies should be shredded.
- personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;

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- D. where Personal data is to be transferred in hardcopy form it should be sent in the manner outlined in the Physical Media Transfer Policy;
- E. no personal data may be shared informally and if an employee, intern, volunteer, agent, subcontractor, or other party working on behalf of Real Group requires access to any personal data that they do not already have access to, such access should be formally requested in-line with the Access Control Policy.
- F. all hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
- G. no personal data may be transferred to any employees, interns, volunteers, agents, contractors, or other parties, whether such parties are working on behalf of Real Group or not, without an appropriate contract and/or data sharing/processing agreement in place;
- H. personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, interns, volunteers, agents, sub-contractors or other parties at any time;
- I. if personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- J. all personal devices used for Real Group's work should be listed and reported in accordance with the Access Control Policy and Information Technology and Computer Use Policy;
- K. all personal data stored electronically should be backed up in line with the Document and Record Control Process;
- L. all electronic copies of personal data should be stored securely using passwords and data encryption;
- M. all passwords used to protect personal data should be selected in accordance with the Password Security Policy.
- N. all passwords must be secured in line with the Password Security Policy;
- O. where personal data held by Real Group is used for marketing and public relation purposes, it shall be the responsibility of the Head of Sales and Marketing to ensure that no data subjects have added their details to the Telephone Preference Service prior to being included in any unsolicited sales or marketing calls.

17. Organisational Measures

Real Group shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- A. all employees, interns, volunteers, agents, contractors, or other parties working on behalf of Real Group shall be made fully aware of both their individual responsibilities and Real Group's responsibilities under the Regulations and under this Policy, and shall be provided with a copy of this Policy;
- B. only employees, interns, volunteers, agents, sub-contractors, or other

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- parties working on behalf of Real Group that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by Real Group;
- C. all employees, interns, volunteers, agents, contractors, or other parties working on behalf of Real Group handling personal data will be appropriately trained to do so;
 - D. all employees, interns, volunteers, agents, contractors, or other parties working on behalf of Real Group handling personal data will be appropriately supervised;
 - E. methods of processing personal data shall be regularly evaluated and reviewed;
 - F. the performance of those employees, interns, volunteers, agents, contractors, or other parties working on behalf of Real Group handling personal data shall be regularly evaluated and reviewed;
 - G. all employees, interns, volunteers, agents, contractors, or other parties working on behalf of Real Group handling personal data will be bound to do so in accordance with the principles of the Regulations and this Policy by contract;
 - H. all agents, contractors, or other parties working on behalf of Real Group ('Data Processors') or work jointly with RG ('Joint Controllers') handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of Real Group arising out of this Policy and the Regulations;
 - I. the Data Protection Act 2018 binds all organisations that process personal data according to the 'processing' and 'personal data' definition in the aforementioned Act. Whether those Data Processors or Joint Controllers sign any Data processor or Joint Controller Agreement or not, it is nevertheless a binding legal obligation and breaches are subject to measures defined by the Act.
 - J. where any agent, contractor or other party working on behalf of Real Group handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless Real Group against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

18. Data Breach Notification

18.1)

All personal data breaches must be reported immediately in-line with the Data Breach and Incident Management Procedure.

18.2)

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Manager must

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ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

18.3)

In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Manager must ensure that all affected data subjects are informed of the breach directly and without undue delay.

18.4)

Data breach notifications shall include the following information:

- A. the categories and approximate number of data subjects concerned;
- B. the categories and approximate number of personal data records concerned;
- C. the name and contact details of Real Group's Data Manager (or other suitable contact point where more information can be obtained);
- D. the likely consequences of the breach;
- E. details of the measures taken, or proposed to be taken, by Real Group to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

19. General Training

Real Group is responsible for ensuring that all of its employees, interns, volunteers, agents, contractors, or other parties working on behalf of Real Group are aware of their personal responsibilities in relation to personal data, ensuring that it is properly protected at all times and is processed only in line with Real Group's procedures.

To this end, Real Group shall ensure that all of its employees, interns, contractors and volunteers are given appropriate and relevant data protection training.

Related Documents

IP04 Information Security Policy

IP11 Document and Record Control Process

IP33 Information Classification Policy

IP34 Secure Disposal Policy

IP35 Physical Media Transfer Policy

IP36 Access Control Policy

IP43 Supplier Security Policy

IP44 Information Security Incident Management

IP50 Privacy Policy for Delegates, Staff and Tutors

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IP51 Privacy Policy for all Other Contacts

IF47 Data Protection Registration

IF50 IMS Meetings schedule

IF53 ICO Compliance Activity Log

RG04 Data Subject Access Request Procedure

RG24 Data Breach and Incident Management Procedure

RG32 Freedom of Information Act Procedure

Cookies and Electronic Tracking Policy

Information Technology and Computer Use Policy

Real Group Email Signatures Policy

Record of Processing Activities

Retention Schedule

Document History

Issue 3

Added policy to current IMS document template

Edited most sections to improve readability and remove ambiguity between this policy and other policies/documents that have been recently revised

Added sections 3.3, 7.4 and 10.2

Removed section 20

Expanded list of related documents to cover all documents referenced in the policy

Issue 2

Updated name of Data Manager

Issue 1

Initial release