
Vada Labs Data Protection Policy

1. Purpose

This Data Protection Policy outlines Vada Labs' commitment to protecting personal data and ensuring compliance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant global data privacy laws.

The policy applies to all employees, contractors, and anyone working on behalf of Vada Labs who processes personal data.

2. Scope

This policy applies to:

- All personal data processed by Vada Labs, whether electronically or in paper form.
 - All employees, contractors, and subprocessors engaged by Vada Labs.
 - All data subjects, including customers, website users, and any individuals whose personal data is collected by Vada Labs.
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3. Key Principles

Vada Labs commits to processing personal data in accordance with the following principles:

- **Lawfulness, Fairness, and Transparency:**
 - Personal data will be processed lawfully, fairly, and transparently.
 - **Purpose Limitation:**
 - Data will only be collected for specific, explicit, and legitimate purposes and not processed in ways incompatible with those purposes.
 - **Data Minimisation:**
 - Only the minimum necessary data will be collected and processed.
 - **Accuracy:**
 - Personal data will be kept accurate and up to date.
 - **Storage Limitation:**
 - Data will not be retained longer than necessary for the purposes it was collected.
 - **Integrity and Confidentiality:**
 - Personal data will be securely processed to prevent unauthorised access, loss, or damage.
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4. Roles and Responsibilities

- **Data Protection Officer (DPO):**
 - Vada Labs is not required to appoint a formal DPO, but [insert role/title, e.g., Operations Manager] will oversee data protection compliance and act as the point of contact for queries.
 - Contact: info@vadalabs.co.uk.

- **Employees and Contractors:**
 - Must follow this policy and attend regular data protection training.
 - Report any data breaches immediately to [insert role/title, e.g., Operations Manager].
 - **Subprocessors:**
 - Third-party providers must comply with Vada Labs' data protection standards and legal obligations.
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5. Data Handling Procedures

Collection and Consent

- Personal data will be collected transparently and only with valid consent or another lawful basis (e.g., contractual necessity or legitimate interests).

Storage and Access

- Data will be securely stored on encrypted servers and only accessible to authorised personnel.
- Paper records (if any) will be stored in locked cabinets with controlled access.

Data Subject Rights

Vada Labs will respond to data subject requests within one month. These include:

- Access to personal data.
- Correction or deletion of inaccurate data.
- Objection to processing or withdrawal of consent.
- Data portability requests.

Retention

- Data will be retained according to the timelines outlined in Vada Labs' Privacy Policy.
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6. Security Measures

Vada Labs will implement the following technical and organisational measures:

- **Encryption:** All electronic data will be encrypted during transmission and at rest.
- **Access Control:** Only authorised personnel will have access to personal data.
- **Training:** Regular training for employees and contractors on data protection best practices.
- **Incident Response Plan:** A documented procedure to handle data breaches, including notification to affected parties and relevant authorities as required by law.

7. Data Breach Reporting

In the event of a data breach:

- Employees must notify [insert role/title] immediately upon discovery.
- Vada Labs will assess the breach and, where necessary:
 - Notify affected individuals within 72 hours.
 - Notify the Information Commissioner's Office (ICO) or other relevant authority.
- Steps will be taken to mitigate harm and prevent recurrence.

8. Third-Party Subprocessors

Vada Labs will:

- Vet subprocessors to ensure they comply with data protection laws.
- Require subprocessors to sign Data Processing Agreements (DPAs).
- Maintain a list of subprocessors available to users upon request.

9. Training and Awareness

All employees and contractors will:

- Receive training on this policy during onboarding and periodically thereafter.
- Be required to sign a confidentiality agreement covering their handling of personal data.

10. Review and Updates

This policy will be reviewed annually or when significant changes occur in data protection laws or Vada Labs' operations. Updates will be communicated to all employees and contractors.

11. Contact Details

For questions about this policy or data protection matters, please contact:

- Email: info@vadalabs.co.uk.
- Address: 71-75 Shelton Street, London, WC2H 9JQ.

Approval

This Data Protection Policy has been approved by: Anna Lewis, Founder, Vada Labs

03.12.2024