

# QUALITY CONTROL & COMPLIANCE INITIATIVE

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To:	All Phonovation Staff

This document is publicly available to any staff member on the following network path:

<File:\\srvadmdc00\dev & it\Quality Control\QC - Phonovation QC & Compliance Initiative.docx>

## Context

This document sets the beginning of Phonovation initiative to promote a **Quality Privacy Program**.

As of November 2013, large projects like RTÉ demand certain levels of data protection taking Phonovation Management to lead the change towards a new compliance program to promote together with all staff members.

## Quality Control Group

For the accomplishment of a Quality Privacy Program, Phonovation Management decided to set a group of strategic staff members to accomplish the task to set and promote initial baselines of the Quality and Privacy Program.

This group is called **Quality Control Group**.

The Group is formed by the following key roles/members:

Role	Name
<b>CEO</b>	Paddy Woods
<b>Director</b>	Gavin Carpenter
<b>CTO</b>	Pedro Quintas
<b>Financial Controller</b>	Ruth Vines
<b>Privacy Officer</b>	Ann Vines
<b>Operations Manager</b>	Mick Guerin
<b>Network Manager</b>	Ciaran Scolard

## Objectives

This Group shall prepare a set of policies to instruct and guide all Phonovation staff members in future projects as well as maintaining active ones. This will form a regulatory roadmap for everyone inside the company.

These policies shall be implemented, documented and measured/monitored and improved based on monitoring results.

The Quality Control Group and especially the Privacy Officer monitor regulatory and legal changes that may affect the Privacy Policies in place.

This is accomplished on a regular basis to ensure at least once a month no law or regulatory change affects active policies.

## **Policies and Documents**

A set of policies and documents shall be in place to be used as reference materials for new staff members, as well to all staff members every time an active policy is updated.

The active documents and policies shall be updated on the following list:

- Quality Control & Compliance Initiative
- Data Protection Policy
- Risk Assessment
- Privacy Policy
- Data Classification Policy
- Data Retention and Disposal Policy

## **Updates and reviews**

The current list of policies and compliance documents shall be reviewed at least once a year.

Every time a change occurs and affects the current company guidelines, the policies and documents should be updated.

## **Staff member notification**

All policies and documents related with this initiative shall be provided and made publicly available on Phonovation local network for consultation.

Any new staff member that joins the company shall be notified about their existence and requested to read and be compliant to the guidelines on the extent of his/her role.

Whenever policies are changed and written documents updated, staff members shall be notified.

It's this Group responsibility to ensure all company staff members are aware of policy changes.

It's the Director duty to ensure the Group notified all staff members accordingly.

## **Privacy Training program**

The staff members who will be processing personal information, confidential data or privileged contents will be subject to dedicated training.

This training is provided by one of the Quality Control Group members.

The training program is focused on active policies applied to real world scenarios like active services provided to customers as demonstration examples.

### **Training roadmap**

- What is Privacy?
- Personal Information
- Privacy or Confidentiality?
- Why Privacy is a Business Issue?
- The Phonovation 10 Privacy Principles
- Quality Privacy Program
  - Quality Control & Compliance Initiative
  - Data Protection Policy
  - Risk Assessment
  - Privacy Policy
  - Data Classification Policy
  - Data Retention and Disposal Policy

## Phonovation 10 Privacy Principles

1. **Management.** The entity defines, documents, communicates and assigns accountability for its privacy policies and procedures.
2. **Notice.** The entity provides notice about its privacy policies and procedures and identifies the purposes for which personal information is collected, used, retained and disclosed.
3. **Choice and consent.** The entity describes the choices available to the individual and obtains implicit or explicit consent with respect to the collection, use and disclosure of personal information.
4. **Collection.** The entity collects personal information only for the purposes identified in the notice.
5. **Use, retention and disposal.** The entity limits the use of personal information to the purposes identified in the notice and for which the individual has provided implicit or explicit consent. The entity retains personal information for only as long as necessary to fulfill the stated purposes or as required by law or regulation and thereafter appropriately disposes of such information.
6. **Access.** The entity provides individuals with access to their personal information for review and update.
7. **Disclosure to third parties.** The entity discloses personal information to third parties only for the purposes identified in the notice and with the implicit or explicit consent of the individual.
8. **Security for privacy.** The entity protects personal information against unauthorized access (both physical and logical).
9. **Quality.** The entity maintains accurate, complete and relevant personal information for the purposes identified in the notice.
10. **Monitoring and enforcement.** The entity monitors compliance with its privacy policies and procedures and has procedures to address privacy-related complaints and disputes.