



Data Protection & UK GDPR Policy

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DATA PROTECTION & UK GDPR POLICY

1. **PURPOSE**

The Company is committed to protecting the privacy and security of personal data and to complying with its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Policy explains how the Company collects, uses, stores and protects personal data and outlines the responsibilities of the Company and its employees when processing personal data.

2. **SCOPE**

This Policy applies to all personal data processed by the Company relating to:

- Job applicants
- Employees (current and former)
- Workers, contractors, apprentices, volunteers and placement students
- Clients, suppliers and business contacts where relevant

This Policy applies to all employees, directors, contractors and anyone who processes personal data on behalf of the Company.

3. **DEFINITIONS**

- Personal data: Any information relating to an identified or identifiable living individual.
- Special category personal data: Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (for identification), health data, or data concerning sex life or sexual orientation.
- Criminal offence data: Personal data relating to criminal convictions and offences.
- Processing: Any operation performed on personal data, including collection, storage, use, disclosure, alteration or deletion.

4. **DATA PROTECTION PRINCIPLES**

The Company processes personal data in accordance with the following principles. Personal data must be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Kept for no longer than necessary
- Processed securely
- Processed in accordance with international transfer rules where applicable

Employees must ensure that they only collect, access and retain personal data that is necessary for their role and must not access personal data without a legitimate business need.

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5. **LAWFUL BASES FOR PROCESSING**

The Company will only process personal data where at least one lawful basis applies, including:

- Performance of a contract
- Legal obligation
- Legitimate interests
- Consent (used sparingly in the employment context)
- Vital interests
- Public task (where applicable)

Special category data and criminal offence data will only be processed where an additional lawful condition applies.

6. **TYPES OF PERSONAL DATA WE HOLD**

The Company processes personal data necessary for employment and business operations, including:

- Personal contact details
- Recruitment and employment history
- Payroll, tax and benefits information
- Performance, disciplinary and training records
- Health and occupational information where required

Further information about how personal data is used, including purposes, lawful bases, retention periods and individual rights, is provided in the Company's Privacy Notices.

7. **DATA SUBJECT RIGHTS**

Individuals have rights in relation to their personal data, including the right to:

- Be informed
- Access their data
- Rectify inaccurate data
- Request erasure
- Restrict processing
- Object to processing
- Data portability
- Protection from solely automated decision-making

Details of how these rights can be exercised are set out in the Data Subject Rights & Subject Access Request Procedure.

Requests must be made in writing and may be subject to identity verification. Requests will be responded to within one month, subject to lawful extensions.

8. **DATA SECURITY**

The Company implements appropriate technical and organisational measures to protect personal data, including:

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- Secure storage of paper records
- Password protection and encryption
- Restricted access to personal data
- Secure disposal of data

Employees must comply with all security requirements. Failure to do so may result in disciplinary action, up to and including dismissal.

Monitoring of systems and facilities is carried out proportionately for security, compliance, health and safety and business continuity purposes, and in accordance with applicable guidance.

9. DATA SHARING & THIRD PARTIES

Personal data will only be shared where necessary and lawful.

Where third parties process data on the Company's behalf, appropriate data processing agreements will be in place.

10. INTERNATIONAL TRANSFERS

Where personal data is transferred outside the UK, appropriate safeguards will be implemented, such as adequacy regulations or approved contractual safeguards.

11. PERSONAL DATA BREACHES

All personal data breaches must be reported immediately in accordance with the Data Breach Management Procedure.

The Company will notify the Information Commissioner's Office (ICO) and affected individuals where legally required.

12. ROLES & RESPONSIBILITIES

The Company has appointed a Data Protection Lead with responsibility for overseeing data protection compliance.

Managers are responsible for ensuring that personal data within their area of responsibility is processed in accordance with this Policy.

All employees are responsible for protecting personal data, following Company procedures, and reporting data protection concerns or breaches immediately.

13. TRAINING

All employees receive data protection training as part of induction and ongoing refresher training where required.

14. RECORDS & ACCOUNTABILITY

The Company is responsible for, and able to demonstrate, compliance with the data protection principles. This includes maintaining appropriate documentation, policies, procedures and records to evidence compliance.

The Company maintains records of processing activities and data breaches to demonstrate compliance with UK GDPR.

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15. REVIEW

This Policy will be reviewed annually or sooner if required due to legislative or organisational change.



C Owens
Group CEO
Date: 27/07/2026

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