

## Protection of Personal Data

Care must be taken to ensure all staff comply with Data Protection regulations. All staff must ensure personal data is controlled and secure and details are not disclosed to any other person (whether inside or outside the company) unless authorised to do so. To ensure staff are aware of data protection obligations and information security we have a training programme in place and all staff are made aware of this policy, our Privacy policy and other relevant company policies.

## Compliance with Data Protection Regulations

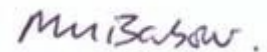
To ensure we are in compliance with data protection regulations including General Data Protection Regulation (GDPR) the company has taken various measures to ensure we are meeting all requirements;

- **Data Protection Officer** – our management system details key responsibilities including details of a Data Protection Officer (DPO)
- **Personal Data Collected** - we do not actively collect or process any personal information other than the details of our employees. We may also hold some personal data from interactions with prospective and existing customers and systems are in place to manage this data.
- **Data Review** - we regularly review and check Personal data by completing a data audit to identify "*any information relating to an identified or identifiable natural person (data subject)*", to ensure the personal data we hold is required, lawfully managed and processed and accurate.
- **Data Retention** - data retention is managed and retention period is documented in our management system manual.
- **Consent** - if any data is to be collected for any purpose other than normal employment purposes we will obtain your explicit consent and you have the right to withdraw this consent at any time.
- **Sensitive Personal Data** - we do not collect or hold any sensitive personal data and DPO should be advised if this is not the case
- **Privacy by Design** - Any new developments, projects or technologies that involve personal data will be reviewed to ensure privacy by design and privacy impact assessment completed.
- **Data Processing / Transfer** - Personal data is processed and handled in a lawful and transparent manner with clear communication of what data we hold, why we hold it and how long we retain it. We will not transfer personal data to any third parties except to those approved for the purposes of taxation, pension, employee checks and payroll administration.
- **International Transfer of Data** – we will not transfer your data internationally and will inform data subjects in any event of international transfer.
- **Data Security** - we have measures in place to protect Confidentiality, Integrity and Accessibility of all company data and complete regular audits and reviews of the security of personal data and information security systems

- **Data Subject Access** – Data subjects have the right to access, correct, transfer or request deletion of the personal data we hold about them. Subject access requests should be directed at our DPO who will respond to all data requests within 1 month. We will not charge for responding to such requests.
- **Data Breaches** – all data breaches will be reported internally and significant breaches will be reported to the ICO and affected data subjects notified within 72 hours of discovery.

Much of the arrangements for management of data, documented information, and ongoing checks including internal audits are all covered by our ISO 9001 compliant integrated management system which is available to all staff. Our management system documentation includes the following;

- Summary of all company procedures and policies relating to Data management / Security
- Organisation details including details of the Data Protection Officer and summary of their responsibilities
- Document register detailing what records we hold, how managed and retention period
- Personal Data Audit & Internal audit of Data / Data Protection & Information Security
- Training arrangements including details of planned training and staff training / competency matrix



MH Barbour  
Managing Director, 22 September 2023