

Form Title: Data Protection
Form Ref: POL 012
Author: PRB Consulting
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DATA PROTECTION POLICY

About the policy

During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about our staff and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 2018 (DPA). The Data Protection Act 2018 is the UK implementation of the General Data Protection Regulations (UK-GDPR). The purpose of this policy is to make you aware of how we will handle your personal data. The policy does not form part of any employees' contract of employment, and we may amend it at any time. The company has achieved compliance with the DPA and UK-GDPR by:

- Ensuring all data is held securely
- Technical and organisational measures include:
 - Encryption
 - Access Control
 - Pseudonymisation
 - Firewalls, anti-malware, intrusion detection
 - Regular security audits
- Appointing a data controller
- Providing data protection training to all employees. Training will include:
 - What is the **UK GDPR** and **Data Protection Act 2018**?
 - What counts as **personal data** and **special category data**?
 - Data Subject Rights (e.g., access, erasure, objection)
 - The role of the **Information Commissioner's Office (ICO)**
 - Data Protection Principles
 - Lawfulness, fairness, transparency
 - Data minimisation and purpose limitation
 - Security and accountability

Data protection principles

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- Used fairly, lawfully and transparently
- Used for specified, explicit purposes
- Used in a way that will be adequate, relevant and limited to only what is necessary
- Accurate and, where necessary, kept up to date
- Kept for no longer than necessary
- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

"Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way

Fair and lawful processing

We will usually only process your personal data where you have given your consent or where the processing is necessary to comply with our legal obligations. In other cases, processing may be necessary for the protection of your vital interests, for our legitimate interests or the legitimate interests of others. The full list of conditions is

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set out in the DPA.

We will only process "sensitive personal data" about ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sex life, criminal proceedings or convictions, where a further condition is also met. Usually this will mean that you have given your explicit consent, or that the processing is legally required for employment purposes. The full list of conditions is set out in the DPA.

How we are likely to use your personal data

We will process data about staff for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations as an employer, for example to pay you, monitor your performance and to confer benefits in connection with your employment.

We may process sensitive personal data relating to staff including, as appropriate:

- a) Information about an employee's physical or mental health or condition in order to monitor sick leave and take decisions as to the employee's fitness for work
- b) The employee's racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation
- c) In order to comply with legal requirements and obligations to third parties

Processing for limited purposes

We will only process your personal data for the specific purpose or purposes notified to you or for any other purposes specifically permitted by the DPA.

Adequate, relevant and non-excessive processing

Your personal data will only be processed to the extent that it is necessary for the specific purposes notified to you.

Accurate data

We will keep the personal data we store about you accurate and up to date. Data that is inaccurate or out of date will be destroyed. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you.

Data retention

We will not keep your personal data for longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems when it is no longer required.

Processing in line with your rights

You have the right to:

- (a) Request access to any personal data we hold about you
- (b) Prevent the processing of your data for direct-marketing purposes
- (c) Ask to have inaccurate data held about you amended
- (d) Prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else
- (e) Object to any decision that significantly affects you being taken solely by a computer or other

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automated process

Data security

We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if he agrees to comply with those procedures and policies, or if he puts in place adequate measures himself.

Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

Providing information to third parties

We will not disclose your personal data to a third party without your consent unless we are satisfied that they are legally entitled to the data. Where we do disclose your personal data to a third party, we will have regard to the eight data protection principles.

Subject access requests

Where an employee makes a request for information to which they are entitled, this must be provided in writing to the appropriate line manager. The employer will provide the requested information

- (a) without undue delay, and
- (b) in any event, within one month of the date of the request
- (c) a fee may be charged if the request is manifestly excessive or additional data is requested.

Data Breach Notification

The company must report **certain types of personal data breaches** to the **ICO** (Information Commissioner's Office) **within 72 hours** and if the breach poses a high risk to individuals, they must also be **informed directly**.

Breaches of this policy

If you consider that this policy has not been followed in respect of personal data about yourself or others you should raise the matter with your line manager. Any breach of this policy will be taken seriously and may result in disciplinary action.

Signed: *David McHugh*

Name: D. McHugh

Role: Managing Director

Date: May 2026