



GDPR POLICY

POLICY STATEMENT

The Company is required to process relevant personal data regarding members of staff, sub-contractors, applicants, customers and clients as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

The General Data Protection Regulations applies to anyone who is a “controller” or “processor” of personal data. A controller determines the purposes and means of processing personal data. A processor is responsible for processing personal data on behalf of a controller.

PRIVACY

The Company is committed to safeguarding the privacy of all staff, sub-contractors, customers and clients.

Privacy applies where the Company is acting as a Data Controller with respect to the personal data of staff sub-contractors, customers and client namely, where the Company determine the purposes and means of the processing of that personal data.

DATA PROTECTION CONTROLLER

The Company’s Data Controller (DPC) is Ian Mallett who will endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 2018. The Freedom of Information Act 2000 and the Protection of Freedoms Act 2012 are also relevant to parts of this policy. The Company recognises The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)

The Company shall so far as be reasonably practicable comply with the Data Protection Principles (the Principles) contained in the Data Protection Act to ensure all data is:

- A. Fairly and lawfully processed
- B. Stored in a fair and transparent manner
- C. Processed for a lawful purpose
- D. Adequate, relevant and not excessive
- E. Accurate and up to date
- F. Not kept for longer than necessary
- G. Processed in accordance with the data subject's rights
- H. Secure
- I. Not transferred to other countries without adequate protection.

PERSONAL DATA

Personal data covers both facts and opinions about an individual where that data identifies an individual. For example, it includes information necessary for employment such as the member of staff's name and address and details for payment of salary. Personal data may also include sensitive personal data as defined in the Act.

PROCESSING OF PERSONAL DATA

You will need to provide your consent for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which

Authorised By: Gavin Ellis	Page 1 of 3	ESL-POL-GDPR-001
Reviewed by: Lauren Tyler	Date: Jan 2026	Version: 2
As part of our system review, this document is valid until Jan 2027		



falls under the definition of personal data and is not otherwise exempt will remain confidential and will only be disclosed to third parties with appropriate consent.

If you wish to revoke or change consent you need to agree on how your data is to be processed with the Data Controller.

You have the right to request an opt-out to the processing of your personal data at any time.

SENSITIVE PERSONAL DATA

The Company may, from time to time, be required to process sensitive personal data. Sensitive personal data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings.

RIGHTS OF ACCESS TO INFORMATION

Data subjects have the right of access to information held by the Company, subject to the provisions of the Data Protection Act 2018 and the Freedom of Information Act 2000. Any data subject wishing to access their personal data should put their request in writing to the Data Controller. The Company will endeavour to respond to any such written requests as soon as is reasonably practicable and, in any event, within 40 days for access to records and 21 days to provide a reply to an access to Data Protection Policy.

INFORMATION REQUEST

The information will be imparted to the data subject as soon as is reasonably possible after it has come to the Company's attention and in compliance with the relevant Acts.

EXEMPTIONS

Certain data is exempted from the provisions of the Data Protection Act which includes the following: -

- A. National security and the prevention or detection of crime
- B. The assessment of any tax or duty
- C. Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the Company, including the prevention of terrorism and radicalisation.

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the DPC.

ACCURACY

The Company will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

ENFORCEMENT

If an individual believes that the Company has not complied with this Policy or acted otherwise than in accordance with the Data Protection Act, the member of staff should utilise the Company's grievance procedure and should also notify the Data Protection Controller.

Authorised By: Gavin Ellis	Page 2 of 3	ESL-POL-GDPR-001
Reviewed by: Lauren Tyler	Date: Jan 2025	Version: 2
As part of our system review, this document is valid until Jan 2026		



DATA SECURITY

The Company will take appropriate technical and organisational steps to ensure the security of personal data.

All staff will be made aware of this policy and their duties under the Act. The Company and therefore all staff are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and be Data Protected. Data shall be encrypted when transported offsite. Other personal data may be for publication or limited publication within the Company, therefore having a lower requirement for data security.

EXTERNAL PROCESSORS

The Company shall ensure that data processed by external processors, for example, service providers, Cloud services including storage, web sites etc. are compliant with this policy and the relevant legislation.

SECURE DESTRUCTION OF DATA

When data held in accordance with this policy is destroyed, it shall be destroyed securely in accordance with best practice at the time of destruction.

RETENTION OF DATA

The Company may retain data for differing periods of time for different purposes as required by statute or best practices. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

The Company may transfer personal data and sensitive personal data outside the European Economic Area in accordance with this policy.

Signed:

Gavin Ellis

CEO

January 2026

Authorised By: Gavin Ellis	Page 3 of 3	ESL-POL-GDPR-001
Reviewed by: Lauren Tyler	Date: Jan 2025	Version: 2
As part of our system review, this document is valid until Jan 2026		