



Group Data Protection Policy





Group Data Protection Policy

Owner	Initial Release	Last Updated	Last Reviewed
GCO	Dec 2015	August 2021	August 2021

→ Executive Summary

What does this policy address?

One of the core assets of our Group and its businesses is information and we regard the proper treatment of information as vital to our success and key to building trust and confidence between us and those we deal with. We understand that information that we collect and process is valuable and actively targeted for misuse by criminals and must therefore be protected. We attach great importance to the way in which we handle information. The focus of this policy is to set out our commitments regarding personal information, whether it relates to our employees, customers, clients or suppliers, in order that we may comply with the Data Protection Act 2018 (implementing the General Data Protection Regulation) and related legislation in the UK, also referred to generally as “GDPR” by many people. It is also vital, however, that we all do the right

thing to protect other business data that is non-personal in nature (such as financial information, and commercial plans). Some of the commitments in this policy will be as directly relevant to non-personal business data as they are to personal information and it is also important that we are all suitably familiar with the related policies referred to at the end of this document that will directly determine our responsibilities regarding non-personal business data as well as personal information.

We are all responsible for protecting personal information.

Failure to comply with this responsibility can damage our reputation and also leave Group businesses and even individual colleagues open to criminal prosecution. A failure to comply is therefore considered a serious matter and could result in disciplinary action, up to and including dismissal or contract termination.

Doing the right thing

- We will collect and use personal information in a fair, lawful and transparent manner, in accordance with the conditions specified in the Data Protection Act 2018 and related legislation
- We will obtain personal information for specified, explicit and legitimate purposes (and, where necessary we will conduct Legitimate Interest Assessments) and will not use it in any way which is incompatible with those purposes
- The personal information we collect and use will be adequate, relevant and limited to what is necessary for our purposes
- We will take steps to ensure that personal information is accurate and, where necessary, kept up to date
- We will retain personal information only for as long as is necessary for our purposes, in line with our Group document retention, archiving and destruction policy(ies)
- We will use appropriate technology and take practical steps to protect the security, integrity and confidentiality of the personal information for which we are responsible
- We will not transfer personal information outside the European Economic Area unless appropriate safeguards are in place
- We will manage our relationships with service providers who process personal information on our behalf, including putting in place suitable contracts
- We will conduct Data Protection Impact Assessments on significant new projects, initiatives and developments and will take steps to address identified privacy risks and to protect the rights of individuals
- We will keep records to demonstrate our data protection compliance activities
- We will protect non-personal business data responsibly, making sure that we are sensitive to risk and act in accordance with relevant related policies (including the Delegation of Authority and Information Security Policy Framework), legal advice and good practice regarding business data confidentiality generally