

Data Protection Policy

Date of Policy: Effective from 1st September 2022

Reviewed by: James McGough

Next Review due by: 1st September 2023



Sutton-McGough Solutions Limited (the **Company**) collects and uses personal data belonging to its staff, associates and the staff, associates and service users of its clients who come into contact with the Company in order to carry out the Company's work.

The Company recognises that personal data must be collected and dealt with appropriately and in accordance with the Data Protection Act 2018 (the **DPA**) and the UK General Data Protection Regulations (**UK GDPR**). The Company also recognises that the correct and lawful treatment of personal data is important to maintain appropriate confidentiality and protect integrity. All staff (including those employed by the Company and those engaged in work for the Company on a contractor or freelance basis) are required to comply with this procedure.

This Data Protection Policy applies to all personal data which is processed by the Company in any format (including paper copies, electronic copies or storage or recorded in any other ordered way).

Responsibility

Julia Sutton-McGough, Director of the Company

Personal Data Protection Principles

The Company adheres to the UK GDPR's principles relating to the processing of personal, which require personal data to be:

- processed lawfully, fairly and in a transparent manner;
- collected only for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- accurate and where necessary kept up to date;
- not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed;
- processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage;
- not transferred to another country without appropriate safeguards being in place; and
- made available to data subjects and allow data subjects to exercise certain rights in relation to their personal data.

You are required to comply with the data protection principles listed above, at all times.



Privacy notices

The Company operates the following Privacy Notices detailing the principles which the Company applies to the handling of personal data and measures which have been put in place to ensure protection of that data and compliance with relevant rules under the UK GDPR and the DPA, including the data protection principles set out above:

- **Staff Privacy Notice** relating to personal data processed and held regarding employees, associates, workers and contractors;
- **Client and Contact Privacy Notice** relating to personal data processed and held regarding the staff, associates and service users of the Company's clients, prospective clients, suppliers and other third party contacts made in the normal course of the Company's work; and
- **Website Privacy Notice** relating to personal data processed and held as a result of individual's accessing the Company's website.

Copies of the Privacy Notices are available from Julia Sutton-McGough. You should ensure that you familiarise yourself with the current version of those notices and review them regularly.

If you are collecting personal data from a data subject, either directly or indirectly, you must provide them with a Privacy Notice. You must only process personal data in accordance with the Privacy Notice provided to a data subject.

Where you are provided with access to the personal data which is covered by one of the Company's Privacy Notices you are required to comply with the Company's data security measures in place and to take all reasonable steps to maintain the confidentiality and security of that data.

Accuracy

You are required to ensure that the personal data held about you by the Company is up to date and you should inform Julia Sutton-McGough immediately if those records require updating.

Any personal data that you collect from data subjects must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.

Data Storage

Personal data must be stored securely, in accordance with the Company's data security measures.

Personal data will not be kept for longer than is necessary for the purposes for which the data is processed and will be deleted after a reasonable time, in accordance with the Company's retention policy.

Sharing Personal Data

You may only share personal data the Company holds with another agent or representative of the Company if the recipient has a job-related need to know the information.

You may only share the personal data the Company holds with third parties, such as its service providers, if:

- they have a need to know the information for the purposes of providing the contracted services;
- sharing the personal data complies with the privacy notice that has been provided to the data subject and, if required, the data subject's consent has been obtained;



- the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- the transfer complies with any applicable cross-border transfer restrictions; and
- a fully executed written contract that contains UK GDPR-approved third party clauses has been obtained.

Record Keeping

You must keep and maintain clear, detailed accurate records of all your data processing activity including, where relevant, records of data subjects' consents and the procedures for obtaining such consent.

Data Subjects Rights and Requests

The rights of data subjects are set out in the Company's Privacy Notices. You must immediately inform Julia Sutton-McGough if a data subject is asserting any such right.

You must immediately forward any data subject request that you receive to Julia Sutton-McGough.

Breach of this Data Protection Policy

All of the Company's employees, workers and associates are required to comply with this Data Protection Policy.

If you suspect that a breach of security has taken place in relation to personal data held by the Company, you are required to notify Julia Sutton-McGough immediately.

Intentional, malicious or careless breach of any of this Data Protection Policy or any Company Privacy Notice or any failure to report suspected breaches of data protection rules will be taken very seriously and may amount to disciplinary action up to and including summary dismissal or, where applicable, termination of your engagement by the Company.

Changes to this Data Protection Policy

The Company keeps this policy under regular review and may amend it from time to time.

Thank you for taking the time to read this policy.

