

Accuracy of Data and Keeping Data Up-to-Date

The Company shall ensure that all personal data collected, processed, and held by it is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out below.

The accuracy of personal data shall be checked when it is collected and at regular thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

Data Retention

The Company shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.

When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

For full details of the Company's approach to data retention, including retention periods for specific personal data types held by the Company, please refer to our Data Protection Officer for details.

Secure Processing

The Company shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in this Policy.

Accountability and Record-Keeping

The Company's Data Protection Officers is Kordel Fenlon, Director, Grundy & Co Excavations Ltd.

The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other data protection-related policies, and with the GDPR and other applicable data protection legislation.

The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

- The name and details of the Company, its Data Protection Officer, and any applicable third-party data processors;
- The purposes for which the Company collects, holds, and processes personal data;
- Details of the categories of personal data collected, held, and processed by the Company, and the categories of data subject to which that personal data relates;
- Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
- Details of how long personal data will be retained by the Company (please contact the Company Data Protection Officer); and
- Detailed descriptions of all technical and organisational measures taken by the Company to ensure the security of personal data.

Data Protection Impact Assessments

The Company shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data. Data Protection Impact Assessments shall be overseen by the Data Protection Officer and shall address the following:

- The type(s) of personal data that will be collected, held, and processed;
- The purpose(s) for which personal data is to be used;
- The Company's objectives;
- How personal data is to be used;
- The parties (internal and/or external) who are to be consulted;
- The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
- Risks posed to data subjects;
- Risks posed both within and to the Company; and
- Proposed measures to minimise and handle identified risks.

Keeping Data Subjects Informed

The Company shall provide the information set out in this policy to every data subject:

- Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and
- Where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:
- if the personal data is used to communicate with the data subject, when the first communication is made; or
- if the personal data is to be transferred to another party, before that transfer is made; or
- as soon as reasonably possible and in any event not more than one month after the personal data is obtained.

The following information shall be provided:

- Details of the Company including, but not limited to, the identity of its Data Protection Officer;
- The purpose(s) for which the personal data is being collected and will be processed and the legal basis justifying that collection and processing;
- Where applicable, the legitimate interests upon which the Company is justifying its collection and processing of the personal data;
- Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
- Where the personal data is to be transferred to one or more third parties, details of those parties;
- Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the "EEA"), details of that transfer, including but not limited to the safeguards in place;
- Details of data retention;
- Details of the data subject's rights under the GDPR;
- Details of the data subject's right to withdraw their consent to the Company's processing of their personal data at any time;
- Details of the data subject's right to complain to the Information Commissioner's Office (the "supervisory authority" under the GDPR);
- Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it; and

- Details of any automated decision-making or profiling that will take place using the personal data, including information on how decisions will be made, the significance of those decisions, and any consequences.

Data Subject Access

Data subjects may make subject access requests (“SARs”) at any time to find out more about the personal data which the Company holds about them, what it is doing with that personal data, and why.

Data subjects wishing to make a SAR may do so in writing, using the Company’s Subject Access Request Form, or other written communication. SARs should be addressed to the Company’s Data Protection Officer at Grundy & Co Excavations Ltd.

Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.

All SARs received shall be handled by the Company’s Data Protection Officer.

The Company does not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

Rectification of Personal Data

Data subjects have the right to require the Company to rectify any of their personal data that is inaccurate or incomplete.

The Company shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Company of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

Erasure of Personal Data

Data subjects have the right to request that the Company erases the personal data it holds about them in the following circumstances:

- It is no longer necessary for the Company to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;
- The data subject wishes to withdraw their consent to the Company holding and processing their personal data;
- The data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so) (see Part 18 of this Policy for further details concerning the right to object);
- The personal data has been processed unlawfully;
- The personal data needs to be erased in order for the Company to comply with a particular legal obligation.

Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

Restriction of Personal Data Processing

Data subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

Objections to Personal Data Processing

Data subjects have the right to object to the Company processing their personal data based on legitimate interests, direct marketing (including profiling).

Where a data subject objects to the Company processing their personal data based on its legitimate interests, the Company shall cease such processing immediately, unless it can be demonstrated that the Company's legitimate grounds for such processing override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

Where a data subject objects to the Company processing their personal data for direct marketing purposes, the Company shall cease such processing immediately.

Personal Data Collected, Held, and Processed

The following personal data is collected, held, and processed by the Company (for details of data retention, please contact the Company Data Protection Officer):

Type of Data	Purpose of Data
Name	Communication by email/telephone/in writing for: delivering services requested, invoicing and making payments for services, administration of contracts, providing information and updates.
Address	As above
Telephone number	As above
Email address	As above
National Insurance number	As above
Gender	As above
Date of birth	As above
Payment information	As above
Business Name	As above
Job title	As above
Profession	As above

Data Security - Transferring Personal Data and Communications

The Company shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

- All emails containing personal data must be marked “confidential”;
- Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted;
- Where personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;
- Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using registered mail;
- All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked “confidential”.

Data Security – Storage

The Company shall ensure that the following measures are taken with respect to the storage of personal data:

- All electronic copies of personal data should be stored securely using passwords;
- All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;
- All personal data stored electronically should be backed up daily;
- No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise without the formal written approval of Kordel Fenlon, and in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary;

- No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken).

Data Security – Disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please contact the Company Data Protection Officer.

Data Security - Use of Personal Data

The Company shall ensure that the following measures are taken with respect to the use of personal data:

- No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested from Kordel Fenlon;
- No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of Kordel Fenlon;
- Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors, or other parties at any time;
- If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it; and
- Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of Kordel Fenlon to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

Data Security - IT Security

The Company shall ensure that the following measures are taken with respect to IT and information security:

- All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.
- Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- All software (including, but not limited to, applications and operating systems) shall be kept up-to-date. The Company's IT staff shall be responsible for installing any and all security-related updates.
- No software may be installed on any Company-owned computer or device without the prior approval of the Kordel Fenlon.

Organisational Measures

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the GDPR and under this Policy, and shall be provided with a copy of this Policy;
- Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;
- Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
- All personal data held by the Company shall be reviewed periodically;
- The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the GDPR and this Policy by contract;
- All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the GDPR; and
- Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

Transferring Personal Data to a Country Outside the EEA

The Company may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.

The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:

- The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;
- The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the GDPR); contractual clauses agreed and authorised by the competent

supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;

- The transfer is made with the informed consent of the relevant data subject(s);
- The transfer is necessary for the performance of a contract between the data subject and the Company (or for pre-contractual steps taken at the request of the data subject);
- The transfer is necessary for important public interest reasons;
- The transfer is necessary for the conduct of legal claims;
- The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or
- The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

Data Breach Notification

All personal data breaches must be reported immediately to the Company's Data Protection Officer.

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

Data breach notifications shall include the following information:

- The categories and approximate number of data subjects concerned;
- The categories and approximate number of personal data records concerned;
- The name and contact details of the Company's data protection officer (or other contact point where more information can be obtained);
- The likely consequences of the breach;
- Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

Implementation of Policy

This Policy shall be deemed effective as of the date below, No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

Signed Date

- 06.02.2025

**Stephen Grundy,
Managing Director
GSH Waste Recycling Ltd**

A handwritten signature in black ink, appearing to read 'S Grundy', is written over the printed name and title of Stephen Grundy.