

## | DATA PROTECTION POLICY |

The Bowmill group is committed to working in accordance with the General Data Protection Regulation and with the highest standards of ethical conduct.

This policy outlines the behaviours and standards required of the; organisation, all employees, workers and third parties in relation to the collection, retention, transfer, disclosure, use and destruction of any personal data.

### **Data Protection Principles**

Bowmill is committed to adhering to the Data Protection Principles.

Information is kept and processed about individuals for legal purposes (such as for payroll), for administration purposes and for the purposes of day-to-day people-management. The Company is aware that in order to process personal data or sensitive personal data, the Company must rely on the data being:

- necessary of the performance of a contract, or;
- in preparation for a contract, or;
- to comply with our legal obligations, or;
- for our legitimate business interests or;
- to perform a task carried out in the public interest or in the exercise of an official authority.

If the Company wishes to hold and process data which does not fall within conditions listed above then it will seek to obtain the consent of the individual.

### **Personal & Sensitive Data**

Bowmill will collect and process personal and sensitive data where appropriate as outlined in the principals above when pursuant to the contract of employment. Additional data outside of this scope will require the explicit consent of the individual.

### **Right of Access**

Individuals have the right to access to information stored about them. Should you wish to have access to data relating to yourself, you should in the first instance contact the Company (see below) and request a Subject Access Request Form. Bowmill will endeavour to respond within one month to provide the information following the subject access request, which it will usually do in electronic format.

In complex cases, or where there are numerous related requests, the Company will liaise with the individual to inform them of progress, and if it is not possible to complete the request within one month, the Company will inform the individual of the delay, the reasons for the delay and reserves the right to extend the timescale for completion by up to a further two months.

In the event that data is retained with third parties, the Company will ensure that the request is communicated and actioned by the third party in line with the timescales outlined above, unless impossible or would require disproportionate effort

Bowmill reserves the right to charge a fee or refuse to respond to a request if it is manifestly unfounded or excessive. Similarly, the Company reserves the right to withhold personal data if disclosing it would adversely affect the rights and freedoms of others.

### **Rectification of Data**

Bowmill is committed to keeping data that is accurate and up to date. Data will be checked for accuracy where possible, and any data that is inaccurate, out of date or unnecessary will be corrected or erased as appropriate.

Should you believe your personal data is incorrect or incomplete or where you are aware that your personal data has changed, please inform us as soon as possible. Bowmill will then take steps to rectify any inaccuracies as soon as possible, and at the latest within one month.

In complex cases, or where there are numerous cases, Bowmill will liaise with the individual to inform them of progress, and if it is not possible to complete the request within one month, the Company will inform the individual of the delay and the reasons for the delay and reserves the right to extend the timescale for completion by up to a further two months.

In the event that data has been disclosed to third parties, Bowmill will ensure that the request for rectification is communicated and actioned by the third party in line with the timescales outlined above, unless this is impossible or would involve disproportionate effort.

### **The Right to be Forgotten**

Also known as 'the right to erasure', the right to be forgotten doesn't provide an absolute right to be forgotten, but data subjects have a right to have personal data erased and to prevent processing in some circumstances i.e. where the data is no longer relevant, accurate or consent is withdrawn.

Should you wish for your own personal data to be partially/fully erased and no longer processed, please contact Bowmill with full details of your request. Bowmill will endeavour to respond to you within one month and either delete the data or explain why it is unable to comply with your request. Circumstances where the Company may be unable to comply include that it is required to retain the information by law, or if the data is needed in connection with legal proceedings.

In complex cases, or where there are numerous related requests, the Company will liaise with you to inform you of progress, and if it is not possible to respond to your request within one month, the Company will inform you of the delay, the reasons for the delay and reserves the right to extend the timescale for completion by up to a further two months, if necessary.

In the event that data is retained with third parties, the Company will ensure that the request is communicated and if appropriate actioned by the third party in line with the timescales outlined above.

### **Security of Data**

Bowmill is committed to taking steps to ensure that personal data is protected, and to prevent any unauthorised access, accidental loss, destruction, unlawful processing, equipment failure or human error, and will do this through the continual monitoring of our security systems and by regular training and awareness raising.

Any data breaches, will be managed according to the procedures documented in BOCS-29.

**Data Retention**

Bowmill is committed to ensuring that subject data is kept for no longer than necessary and only kept as long as it's relevant and necessary for legitimate purposes. As soon as data is no longer necessary for the purposes for which it was originally collected, it will be securely deleted, unless it is necessary to keep the data.

The Company does not intentionally keep data longer than necessary and when data is no longer required, the Company is committed to securely deleting it as soon as possible.

**Data Breaches**

All staff are responsible for data protection and should be alert to any actual, suspected, threatened or potential data protection breaches. Refer to BOCS-29.

**Transferring Personal Data to a Country outside the EEA**

We confirm that whilst we will transfer your data to third parties and suppliers within the EEA, we will not transfer your data to a country outside the EEA.

**Contact Information:**

Please forward all requests for information or action to the following address:

The Bowmill Group  
FAO HR Department (GDPR)  
18-30 Morris Road  
Nuffield Industrial Estate  
Poole  
Dorset, BH17 0GG