

# Data Protection and GDPR Policy

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## 1. Introduction

Statom Group Ltd is dedicated to safeguarding the personal data of our employees/personnel, customers, suppliers, and other stakeholders in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy outlines our approach to data protection, including how we collect, use, store, and protect personal data, and our procedures for responding to data breaches.

## 2. Scope

This policy applies to the processing of personal data in both manual and electronic records held by Statom Group. It encompasses all individuals working at all levels, including employees, consultants, contractors, trainees, and other personnel. It also addresses our obligations concerning data protection and the response to data breaches.

## 3. Definitions

- **Personal Data:** Any information relating to an identifiable individual, such as names, addresses, email addresses, phone numbers, financial details, and other identifying information.
- **Data Subject:** The individual whose personal data is being processed.
- **Processing:** Any operation performed on personal data, such as collection, storage, use, transfer, or deletion.
- **Data Controller:** Statom Group, responsible for determining the purposes and means of processing personal data.
- **Data Processor:** A third party that processes personal data on behalf of Statom Group.
- **UK GDPR:** The United Kingdom General Data Protection Regulation, which sets out rules and regulations for processing personal data in the UK.

## 4. Our Commitment

Statom Group is committed to ensuring that all personal data is processed in compliance with UK GDPR and domestic laws. We pledge to:

- Ensure that all employees conduct themselves in line with data protection principles.
- Ensure that third parties processing data on our behalf uphold our data protection standards.

## 5. Types of Data Held

The company may hold the following types of personal data:

- Name, address, phone numbers (including those of next of kin)
- CVs and information gathered during recruitment.
- References from former employers
- National Insurance numbers
- Job title, job descriptions, and pay grades.
- Conduct issues, such as disciplinary proceedings.
- Holiday records
- Internal performance information

- Medical or health information
- Sickness absence records
- Tax codes
- Terms and conditions of employment
- Training details

## Sensitive Data

We process special categories of personal data, such as health information, to ensure workplace health and safety, provide workplace adjustments, and administer benefits. Processing of other special categories, like ethnic origin or religion, is done for equal opportunities monitoring and to meet legal obligations.

## 6. Data Protection Principles

All personal data will be processed according to the following principles:

- **Lawfulness, Fairness, and Transparency:** Data will be processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Data will be collected for specified, explicit, and legitimate purposes.
- **Data Minimisation:** Data collected will be adequate, relevant, and limited to what is necessary for processing.
- **Accuracy:** Data will be accurate and kept up to date. Inaccurate data will be rectified or erased promptly.
- **Storage Limitation:** Data will not be retained longer than necessary for the purpose for which it was collected.
- **Integrity and Confidentiality:** Data will be processed securely, protecting against unauthorised access, loss, destruction, or damage.
- **International Transfers:** Data transfers outside the UK will comply with relevant data protection procedures.

## 7. Data Subject Rights

Data subjects have the following rights:

- **Right to be Informed:** Individuals have the right to be informed about how their data is used.
- **Right of Access:** Individuals can request access to their personal data.
- **Right to Rectification:** Individuals can request correction of inaccurate data.
- **Right to Erasure:** Individuals can request deletion of their data in certain circumstances.
- **Right to Restrict Processing:** Individuals can request restriction of data processing.
- **Right to Data Portability:** Individuals can request data in a machine-readable format.
- **Right to Object:** Individuals can object to data processing, particularly for direct marketing.
- **Rights related to Automated Decision-Making and Profiling:** Individuals are protected from decisions based solely on automated processing.

## 8. Procedures

To protect personal data, Statom Group Ltd will:

- Provide information to employees about their data protection rights and how their data is used.
- Offer training to employees on data protection and confidentiality.
- Maintain a record of personal data, its sources, and its sharing practices.
- Conduct risk assessments to identify and mitigate data handling vulnerabilities.
- Ensure consent is obtained, recorded, and managed appropriately.
- Implement mechanisms to detect, report, and investigate data breaches.

## 9. Access to Data

Data subjects can request access to their personal data. The Company will provide this data within 40 days at no charge. Employees can access data about themselves but not data about other employees or third parties, except where redactions are possible.

## 10. Data Disclosures

The Company may disclose personal data for purposes such as:

- Employee benefits and insurance
- Health and safety obligations
- Statutory Sick Pay
- HR management and administration

Disclosures will only be made when necessary and in accordance with data protection principles.

## 11. Data Security

Statom Group adopts procedures to ensure data security, including:

- Secure storage and restricted access to confidential information.
- Prohibition of sending sensitive information to personal email addresses.
- Regular accuracy checks on data entry.
- Use of strong passwords and screen blanking.

Failure to adhere to these rules may result in disciplinary action.

## 12. International Data Transfers

Statom Group Ltd does not transfer personal data outside the EEA.

### 13. Data Protection Officer (DPO)

Statom Group Ltd has appointed a Data Protection Officer (DPO) Edward Nixon - responsible for overseeing data protection compliance. The DPO is the primary contact for data subjects and regulatory authorities.

### 14. Review of Policy

This policy will be reviewed regularly and updated as necessary to reflect changes in legislation or company practices.

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**Effective Date:** 01/09/2024

**Policy Owner:** Martina Oyite – Head of HR

**Review Date:** 31/08/2025



**Approved by - Paul Whelan – Managing Director**

