



## Data Protection Policy

### 1 Introduction

Bridgewater Security (We) are fully aware of the recent changes in Data Protection legislation and as a result of this have updated our Data Protection Policy and practices to reflect these changes. In order to demonstrate compliance, we have implemented a Personal Information Management System in line with the requirements of BS 10012:2017 and have integrated this into our existing ISO Management System.

### 2 Purpose

The purpose of this policy is to provide guidance on how we intend to comply with the legislative and contractual requirements associated with processing personal information.

### 3 Policy

Our Data Protection Policy applies to all personally identifiable information processed by and on behalf of Bridgewater Security. The policy's goal is to ensure that the processing of personal information only takes place where it is strictly necessary for legal, regulatory or legitimate purposes. The policy is intended to drive the implementation and maintenance of a PIMS in accordance with BS 10012:2017 Personal Information Management System.

Our organisation does not collect information relating to or directly from children. For those Data Subjects whom we do process personal data on, we shall operate practices that ensure personally identifiable information is accurate, and where necessary, up-to-date.

The Personal Information Management System and associated objectives shall ensure that:

- We process the minimum amount of personally identifiable information (PII) required for the purposes of collection;
- We provide individuals with clear information regarding how their PII can be used and by whom;
- All PII processed shall be done in a fair and lawful manner;
- We have an up-to-date documented inventory detailing the categories of PII processed by our organisation;
- We shall only retain personal information for as long as is necessary and shall ensure that secure disposal methods are used once the retention periods are met;
- We respect individual's rights in relation to their PII and keep it secure;
- We only transfer PII outside of the UK in circumstances where it is adequately protected, PII processed by us never leaves the EEA;
- We continually improve the performance of our personal management system whilst continuing to comply with all applicable requirements.

Our Data Protection Officer is responsible for maintaining this policy and providing support and advice during its implementation. All line managers are directly responsible for ensuring staff compliance in the respective departments.





## Data Protection Policy

Bridgewater Security will fully comply with the principles associated with General Data Protection Regulation 2016 and Data Protection Act 2018 which state that information must be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered incompatible with the initial purposes;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes and subject to the implementation of appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

The policy will be reviewed annually by the Senior Management and shall be available to interested parties upon request.

Signature:

Date: 04/01/2023

