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## Data Protection Policy

### Introduction

Trustseal is committed to protecting the privacy and personal data of individuals in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018 (DPA 2018)**. The Finance Director (Joint Managing Director), as the designated Data Controller, is responsible for ensuring the organisation adheres to these regulations and promotes good practice in the handling of personal data. This policy applies to all employees, contractors, customers, suppliers, and other individuals or entities whose personal data is processed by Trustseal.

### Scope

To operate effectively, Trustseal collects and processes personal data, including but not limited to information about employees, suppliers, customers, contractors, and business partners. Such data is managed with due regard to legal requirements and appropriate safeguards. This policy applies to all forms of data collection, recording, storage, and processing, regardless of medium (electronic, paper-based, or other formats).

### Key Definitions

- **Data Controller:** An individual or organisation responsible for determining the purposes and means of processing personal data. At Trustseal, this is the Joint Managing Director.
- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Special Category Data:** Sensitive personal data such as racial or ethnic origin, political opinions, religious beliefs, trade union membership, health data, sexual orientation, or biometric data for identification purposes.
- **Processing:** Any operation or set of operations performed on personal data, including collection, recording, organisation, storage, alteration, retrieval, disclosure, or deletion.
- **Data Subject:** An individual whose personal data is processed.
- **Data Processor:** Any individual or organisation processing data on behalf of the Data Controller.

### Principles of Data Protection

In accordance with the **UK GDPR**, Trustseal adheres to the following principles:

- **Lawfulness, fairness, and transparency:** Personal data must be processed lawfully, fairly, and transparently.
- **Purpose limitation:** Data is collected for specified, explicit, and legitimate purposes and not processed further in ways incompatible with those purposes.
- **Data minimisation:** Personal data must be adequate, relevant, and limited to what is necessary for processing purposes.
- **Accuracy:** Data must be accurate and kept up to date.
- **Storage limitation:** Personal data must not be kept for longer than necessary for processing purposes.
- **Integrity and confidentiality:** Data must be processed securely, protecting it from unauthorised or unlawful processing, loss, destruction, or damage.
- **Accountability:** Trustseal takes responsibility for and demonstrates compliance with these principles.

### Rights of Data Subjects

Under the **UK GDPR**, individuals have the following rights:

- **Access:** The right to access their personal data and receive information about its processing.
- **Rectification:** The right to correct inaccurate or incomplete data.
- **Erasure:** The right to request the deletion of personal data in specific circumstances (the "right to be forgotten").
- **Restriction:** The right to request the restriction of processing under certain conditions.
- **Data Portability:** The right to receive personal data in a commonly used format and transfer it to another controller.
- **Objection:** The right to object to processing, particularly for direct marketing purposes.
- **Automated Decision-Making:** The right not to be subject to decisions based solely on automated processing, including profiling, that produce legal or significant effects.

All requests to exercise these rights must be addressed within **one month**, unless an extension is necessary under complex circumstances.

## Commitment to Compliance

Trustseal will:

- **Appoint a Data Protection Officer (DPO)** or ensure a senior individual is responsible for compliance and implementation of this policy.
- Maintain a **Record of Processing Activities (RoPA)**, documenting all data handling processes.
- Conduct regular **Data Protection Impact Assessments (DPIAs)** for high-risk processing activities.
- Implement technical and organisational measures to safeguard personal data, such as encryption, access controls, and secure storage solutions.
- Provide regular training and awareness programs for employees handling personal data.
- Notify the Information Commissioner's Office (ICO) and affected individuals of any personal data breaches, as required by law.

## Data Protection and Employment

Trustseal holds personnel data for the purposes of personnel administration, payroll, statutory compliance, and employment-related purposes. Data related to job applicants, current employees, and former employees is processed securely and in compliance with the **UK GDPR**.

Access to employment data is strictly limited to authorised personnel. Data will not be disclosed without the employee's consent unless required by law.

## Data Sharing and Transfers

Trustseal will only share personal data with third parties when necessary for operational purposes, with appropriate safeguards in place, or when required by law. Any transfer of personal data outside the UK will comply with international data transfer requirements under the **UK GDPR**.

## Retention and Disposal

Trustseal will retain personal data only as long as necessary for the purposes for which it was collected or as required by law. Data no longer required will be securely deleted or destroyed.

## Complaints and Queries

Any concerns or complaints regarding the handling of personal data should be directed to the Finance Director. If the matter is unresolved, individuals have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**.

## Policy Review

This policy will be reviewed annually or sooner if required by changes in legislation or company operations.



Jon Wragg

Date 18/11/24

Operations Directors