

Purpose: This policy outlines Steve J Martin Ltd's commitment to protecting personal data. It establishes the framework for data protection within our organization.

Scope: This policy applies to all personal data processed by Steve J Martin Ltd, including employee data, client data, supplier data, and any other personal data collected, used, stored, or transferred by the organization.

Policy Statement: Steve J Martin Ltd is committed to:

- Complying with all applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR).
- Protecting personal data from unauthorized access, use, disclosure, alteration, or destruction.
- Ensuring that personal data is processed fairly and lawfully.
- Maintaining the accuracy and integrity of personal data.
- Ensuring that personal data is kept for no longer than necessary.
- Implementing appropriate technical and organizational measures to protect personal data.

Data Controller:

Steve J Martin Ltd is the data controller for personal data processed within the organization.

Data Processing Principles:

We will process personal data in accordance with the following principles:

- Lawfully, fairly, and transparently
- For specified, explicit, and legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up-to-date
- Stored in a form which permits identification of data subjects for no longer than necessary
- Processed in a manner that ensures appropriate security of the data, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.

Data Subject Rights:

We will recognize and respect the rights of data subjects, including:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- The right to be informed of a breach
-

Data Security:

We will implement appropriate technical and organizational measures to protect personal data from unauthorized access, use, disclosure, alteration, or destruction. These measures will include:

- Physical security measures
- Access controls
- Data encryption
- Regular backups
- Incident response procedures

Data Retention:

We will only retain personal data for as long as necessary for the purposes for which it was collected.

International Transfers:

We will ensure that any personal data transferred outside the European Economic Area (EEA) is subject to appropriate safeguards.

Data Breaches:

We will have procedures in place to detect, report, investigate, and respond to data breaches.

Responsibilities:

- **Management:**
 - Develop and implement data protection policies and procedures.
 - Ensure adequate resources are allocated for data protection.
 - Monitor and review data protection performance.
 - Investigate data breaches and take appropriate action.
- **Data Protection Officer:**
 - Provide advice and guidance on data protection matters.
 - Monitor compliance with data protection laws and regulations.
 - Conduct data protection impact assessments.
- **Employees:**
 - Comply with data protection policies and procedures.
 - Handle personal data responsibly.
 - Report any data breaches or security incidents.

Review and Improvement:

This policy will be reviewed regularly to ensure its effectiveness. We will continuously improve our data protection practices.

Steve Martin
Company Director

Steve Martin