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## Data Protection Policy

### Introduction

Trustseal Ltd is committed to protecting the privacy and personal data of individuals in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). The Managing Director & General Manager is responsible for overseeing compliance as the designated Data Protection Lead. This policy applies to all employees, contractors, customers, suppliers, and other individuals whose personal data is processed by Trustseal..

### Scope

This policy applies to all personal data collected, processed, stored, or shared by Trustseal in any form (electronic, paper-based, or otherwise). It covers data relating to employees, customers, suppliers, contractors, and other business contacts.

### Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Special Category Data:** Sensitive data such as health, race, religion, or biometric identifiers.
- **Processing:** Any operation performed on personal data, including collection, storage, use, disclosure, or deletion.
- **Data Subject:** The individual to whom the personal data relates.
- **Data Controller:** The person who determines the purpose and means of processing (Trustseal Ltd).
- **Data Processor:** A third party processing personal data on behalf of Trustseal.

### Lawful Bases for Processing

Trustseal processes personal data lawfully, relying on one or more of the following legal bases:

- The data subject has given consent.
- Processing is necessary for the performance of a contract.
- Processing is required to comply with a legal obligation.
- Processing is necessary to protect vital interests.
- Processing is necessary for legitimate interests pursued by Trustseal, unless overridden by data subject rights.

### 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:

- 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.

Trustseal is not required to appoint a statutory Data Protection Officer. However, the General Manager is the designated contact for all data protection matters.

### **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 03/03/26

Operations Directors