



POLICY REGARDING DATA PROTECTION OF PERSONAL DETAILS (GDPR)

Threeshires Ltd is committed to a policy of protecting the rights and privacy of individuals, Staff and others, in accordance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act (DPA) 2018.

Where required, Threeshires Ltd enters into appropriate Data Processing Agreements (DPAs) and Data Sharing Agreements with third parties in accordance with UK GDPR and the Data Protection Act 2018.

Threeshires Ltd maintains registration with the Information Commissioner's Office (ICO) and pays the applicable data protection fee where required under the Data Protection (Charges and Information) Regulations 2018.

Threeshires Ltd is responsible for, and able to demonstrate, compliance with UK GDPR principles.

Individuals have the right to complain to the Information Commissioner's Office (ICO) if they believe their data has been processed unlawfully.

Threeshires Ltd does not currently make solely automated decisions that produce legal or similarly significant effects on individuals.

This policy applies to the processing of personal data in manual and electronic records kept by Threeshires Ltd in connection with its human resources function as described below. It also covers Threeshires Ltd.'s response to any data breach and other rights under the UK General Data Protection Regulation and current Data Protection Act.

The new regulatory environment demands higher transparency and accountability in how workplaces manage and use personal data. It also accords new and stronger rights for individuals to understand and control that use. The UK GDPR contains provisions that the workplace will need to be aware of as data controllers, including provisions intended to enhance the protection of all workforce's personal data.

This policy applies to the personal data of job applicants, existing and former employees, apprentices, volunteers, placement students, workers and self-employed contractors. These are referred to in this policy as relevant individuals.

"Personal data" is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, online identifier. It can also include pseudonymised data.

"Special categories of personal data" is data which relates to an individual's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

"Criminal offence data" is data which relates to an individual's criminal convictions and offences.

Criminal offence data will only be processed where authorised under Article 10 UK GDPR and Schedule 1 of the Data Protection Act 2018.

"Data processing" is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

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For example, the UK GDPR requires that:

Threeshires Ltd must ensure that the workplace privacy notices are written in a clear, plain way that Staff will understand.

To comply with various legal obligations, including the obligations imposed on it by the UK General Data Protection Regulation (UK GDPR), Threeshires Ltd must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

Compliance

This policy applies to all staff of Threeshires Ltd, any breach of this policy may result in disciplinary action

As a matter of best practice, other agencies and individuals working for Threeshires Ltd and who have access to personal information, will be expected to read and comply with this policy. It is expected that departments who are responsible for dealing with external bodies will take the responsibility for ensuring that such bodies sign a contract which among other things will include an agreement to abide by this policy.

Threeshires Ltd makes a commitment to ensuring that personal data, including special categories of personal data and criminal offence data (where appropriate) is processed in line with UK GDPR and domestic laws and all its employees conduct themselves in line with this, and other related, policies. Where third parties process data on behalf of Threeshires Ltd, Threeshires Ltd will ensure that the third party takes such measures in order to maintain Threeshires Ltd's commitment to protecting data. In line with current data protection legislation, Threeshires Ltd understands that it will be accountable for the processing, management and regulation, and storage and retention of all personal data held in the form of manual records and on computers.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments to the UK GDPR and other relevant legislation.

UK General Data Protection Regulation (UK GDPR)

The UK GDPR regulates the processing of personal data and protects the rights and privacy of all living individuals, for example by giving all individuals who are the subject of personal data a general right of access to the personal data which relates to them. Individuals can exercise the right to gain access to their information by means of a 'subject access request'. Personal data is information relating to an individual and may be in hard or soft copy (paper/manual files; electronic records; photographs; CCTV images) and may include facts or opinions about a person.

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Types of Data held

Personal data is kept in personnel files or within Threeshires Ltd.'s HR systems. The following types of data may be held by Threeshires Ltd, as appropriate, on relevant individuals:

- name, address, phone numbers - for individual and next of kin
- CVs and other information gathered during recruitment
- references from former employers
- National Insurance numbers
- job title, job descriptions and pay grades
- conduct issues such as letters of concern, disciplinary proceedings
- holiday records
- internal performance information
- medical or health information
- sickness absence records
- tax codes
- terms and conditions of employment
- training details

Relevant individuals should refer to Threeshires Ltd.'s privacy notice for more information on the reasons for its processing activities, the lawful bases it relies on for the processing and data retention periods.

Retention periods are defined within the company retention schedule.

Responsibilities under the UK GDPR

Threeshires Ltd will be the 'data controller' under the terms of the legislation – this means it is ultimately responsible for controlling the use and processing of the personal data.

The Compliance Manager is the appointed Data Protection Lead and is responsible for all day-to-day data protection matters and will be responsible for ensuring that all members of staff and relevant individuals abide by this policy.

Threeshires Ltd is the Data Controller. Day-to-day responsibility for monitoring compliance is delegated to the Data Protection Lead.

Compliance with the legislation is the personal responsibility of all members of Threeshires Ltd who process personal information. Individuals who provide personal data to Threeshires Ltd are responsible for ensuring that the information is accurate and current.

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Data Protection Principles

The legislation places a responsibility on every data controller to process any personal data in accordance with the core principles. More detailed guidance on how to comply with these principles can be found on (www.ico.org.uk) In order to comply with its obligations, Threeshires Ltd undertakes to adhere to the principles below:

- be processed fairly, lawfully and in a transparent manner
- be collected for specific, explicit, and legitimate purposes
- be adequate, relevant and limited to what is necessary for the purposes of processing
- be kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay
- not be kept for longer than is necessary for its given purpose
- be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- comply with the relevant data protection procedures for international transferring of personal data.

In addition, personal data will be processed in recognition of an individuals' data protection rights, as follows:

- the right to be informed
- the right of access
- the right for any inaccuracies to be corrected (rectification)
- the right to have information deleted (erasure)
- the right to restrict the processing of the data
- the right to portability
- the right to object to the inclusion of any information
- the right to regulate any automated decision-making and profiling of personal data

DUAA / Data Sharing Agreement

- third-party processors must have written agreements
- data sharing/access agreements are mandatory
- processors must comply with UK GDPR security obligations

Third-Party Data Processing and Access

Where third parties process personal data on behalf of Threeshires Ltd, a written Data Processing Agreement (DPA), Data Use and Access Agreement (DUAA), or equivalent contractual arrangement will be implemented to ensure:

- confidentiality
- lawful processing
- appropriate security measures
- restricted access
- breach reporting obligations
- data retention and deletion requirements
- compliance with UK GDPR and the Data Protection Act 2018

No third party may process personal data without appropriate contractual safeguards being in place.

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Lawful Basis for Processing

Threeshires Ltd processes personal data under one or more of the following lawful bases:

- performance of a contract
- compliance with legal obligations
- legitimate interests pursued by the company
- protection of vital interests
- explicit consent where required by law

Special category data is processed in accordance with Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018.

Processing	Lawful Basis	Retention Period
Payroll	Legal Obligation	7 Years
Employment Contract	Contractual	7 Years
Absence Management	Legitimate Interests / Employment Law	7 Years
Equality Monitoring	Employment Law + Schedule 1 DPA 2018	7 Years
Recruitment	Legitimate Interests prior to contract	7 Years
CCTV	Legitimate Interests	10 Days
Employee Monitoring	Legitimate Interests	7 Years
Right to Work Checks	Legal Obligation	7 Years
Visa Status Check	Legal Obligation	7 Years
Disciplinary Records	Legitimate Interests / Employment Law	7 Years
Benefits Administration	Legal Obligation	7 Years

CCTV processing will be conducted transparently, with appropriate signage in place and retention periods defined within the CCTV Policy.

1) Process personal data fairly and lawfully.

Threeshires Ltd will make all reasonable efforts to ensure that individuals who are the focus of the personal data (data subjects) are informed of the identity of the data controller, the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

2) Process the data for the specific and lawful purpose for which it collected that data and not further process the data in a manner incompatible with this purpose.

Threeshires Ltd will ensure that the reason for which it collected the data originally is the only reason for which it processes those data, unless the individual is informed of any additional processing before it takes place.

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3) Ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed.

Threeshires Ltd will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained. Forms for collecting data will always be drafted with this in mind. Any personal data identified as unnecessary or excessive will be securely deleted or anonymised where appropriate.

4) Keep personal data accurate and, where necessary, up to date.

Threeshires Ltd will review and update all data on a regular basis. It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and each individual should notify the management if, for example, a change in circumstances means that the data needs to be updated. It is the responsibility of Threeshires Ltd to ensure that any notification regarding the change is noted and acted upon.

5) Only keep personal data for as long as is necessary.

Threeshires Ltd undertakes not to retain personal data for longer than is necessary to ensure compliance with the legislation, and any other statutory requirements. This means Threeshires Ltd will undertake a regular review of the information held and implement a review process. Threeshires Ltd will dispose of any personal data in a way that protects the rights and privacy of the individual concerned (e.g., secure electronic deletion, shredding and disposal of hard copy files as confidential waste). A log will be kept of the records destroyed.

6) Process personal data in accordance with the rights of the data subject under the legislation.

Individuals have various rights under the legislation including a right to:

- Be told the nature of the information that Threeshires Ltd holds and any parties to whom this may be disclosed.
- Prevent processing likely to cause damage or distress.
- Prevent processing for purposes of direct marketing.
- Be informed about the mechanics of any automated decision process that will significantly affect them.
- Not have significant decisions that will affect them taken solely by automated process.
- Sue for compensation if they suffer damage by any contravention of the legislation.
- Take action to rectify, block, erase or destroy inaccurate data.
- Request that the Office of the Information Commissioner assess whether any provision of the Act has been contravened.

Threeshires Ltd will only process personal data in accordance with individuals' rights.

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7) Put appropriate technical and organisational measures in place against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data.

All members of Staff are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties. Threeshires Ltd will ensure that all personal data is accessible only to those who have a valid reason for using it.

Threeshires Ltd will have in place appropriate security measures e.g. ensuring that hard copy personal data is kept in lockable filing cabinets/cupboards with controlled access (with the keys then held securely in a key cabinet with controlled access):

- keeping all personal data in a lockable cabinet with key-controlled access.
- password protecting personal data held electronically.
- archiving personal data which are then kept securely (lockable cabinet).
- placing any PCs or terminals, CCTV camera screens etc. that show personal data so that they are not visible except to authorised staff.
- ensuring that PC screens are not left unattended without a password protected screen saver being used.

In addition, Threeshires Ltd will put in place appropriate measures for the deletion of personal data - manual records will be shredded or disposed of as 'confidential waste' and appropriate contract terms will be put in place with any third parties undertaking this work. Hard drives of redundant PCs will be wiped clean before disposal or if that is not possible, destroyed physically. A log will be kept of the records destroyed.

This policy also applies to Staff who process personal data 'off-site', e.g. when working at home, and/or working at a Third-Party Location/site, and in all circumstances, additional care must be taken regarding the security of the data.

8) Threeshires Ltd processes personal data in accordance with the UK GDPR and the Data Protection Act 2018. While the UK GDPR is derived from the European Union GDPR framework, Threeshires Ltd complies with the requirements of UK data protection law as applicable within the United Kingdom.

Where personal data is transferred internationally, Threeshires Ltd will ensure appropriate safeguards are in place in accordance with UK GDPR requirements. Where required by law, individuals will be informed and consent obtained where appropriate

This also applies to publishing information on the Internet - because transfer of data can include placing data on a website that can be accessed from outside the United Kingdom - Threeshires Ltd will always seek consent before placing photographs on its website. Consent as a basis for processing, although it is not always necessary to gain consent from individuals before processing their data, it is often the best way to ensure that data is collected and processed in an open and transparent manner. Where consent is relied upon as a lawful basis for processing, Threeshires Ltd will ensure that consent is freely given, specific, informed and unambiguous.

Threeshires Ltd understands consent to mean that the individual has been fully informed of their intended processing and has signified their agreement and without having any undue influence exerted upon them. Consent obtained on the basis of misleading information will not be a valid basis for processing. Consent cannot be inferred from the non-response to a communication.

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International data transfers

Where personal data is transferred outside the UK, Threeshires Ltd will ensure appropriate safeguards are in place in accordance with UK GDPR requirements. Threeshires Ltd seeks to minimise international transfers where possible.

Personal Details

For the purposes of the UK General Data Protection Regulation (UK GDPR)

Threeshires Ltd processes employee personal data in accordance with its legal obligations, contractual requirements, legitimate business interests.

Procedures

Threeshires Ltd has taken the following steps to protect the personal data of relevant individuals, which it holds or to which it has access:

- it appoints or employs employees with specific responsibilities for:
 - a. the processing and controlling of data.
 - b. the comprehensive reviewing and auditing of its data protection systems and procedures.
 - c. overseeing the effectiveness and integrity of all the data that must be protected.There are clear lines of responsibility and accountability for these different roles.
- it provides information to its employees on their data protection rights, how it uses their personal data, and how it protects it. The information includes the actions relevant individuals can take if they think that their data has been compromised in any way.
- it provides its employees with information and training to make them aware of the importance of protecting personal data, to teach them how to do this, and to understand how to treat information confidentially.
- it can account for all personal data it holds, where it comes from, who it is shared with and also who it might be shared with.
- it carries out risk assessments as part of its reviewing activities to identify any vulnerabilities in its personal data handling and processing, and to take measures to reduce the risks of mishandling and potential breaches of data security. The procedure includes an assessment of the impact of both use and potential misuse of personal data in and by Threeshires Ltd.
- it recognises the importance where consent is relied upon as the lawful basis, Threeshires Ltd will ensure obtaining, recording, using, sharing, storing and retaining their personal data, and regularly reviews its procedures for doing so, including the audit trails that are needed and are followed for all consent decisions. Threeshires Ltd understands that consent must be freely given, specific, informed and unambiguous. Threeshires Ltd will seek consent on a specific and individual basis where appropriate. Full information will be given regarding the activities about which consent is sought. Relevant individuals have the absolute and unimpeded right to withdraw that consent at any time.
- it has the appropriate mechanisms for detecting, reporting and investigating suspected or actual personal data breaches, including security breaches. It is aware of its duty where a personal data breach is likely to result in a risk to the rights and freedoms of individuals to the Information Commissioner, is aware of the possible consequences.
- it is aware of the implications international transfer of personal data.

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Access to Data

Relevant individuals have a right to be informed whether Threeshires Ltd processes personal data relating to them and to access the data that Threeshires Ltd holds about them. Requests for access to this data will be dealt with under the following summary guidelines:

- a form on which to make a subject access request is available from Threeshires Ltd HR Manager. The request should be made to Threeshires Ltd HR Manager.
- Threeshires Ltd will not charge for the supply of data unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request
- Threeshires Ltd will respond to a request without delay. Access to data will be provided, subject to legally permitted exemptions, within one month as a maximum. This may be extended by a further two months where requests are complex or numerous.

Relevant individuals must inform Threeshires Ltd immediately if they believe that the data is inaccurate, either as a result of a subject access request or otherwise. The Company will take immediate steps to rectify the information.

For further information on making a subject access request, employees should refer to our subject access request policy, available from Threeshires Ltd HR Manager.

Threeshires Ltd may request proof of identity where reasonable and proportionate to confirm the identity of the requester before responding to a subject access request.

Data Disclosures

Threeshires Ltd may be required to disclose certain data/information to any person/organisation. The circumstances leading to such disclosures may include:

- Any employee benefits operated by third parties
- Individuals' health data - to comply with health and safety or occupational health obligations.
- for Statutory Payments.
- disabled individuals - whether any reasonable adjustments are required to assist them at work, this could include third parties, clients and organisations, involved in ensuring safe working practices.
- For Statutory Sick Pay purposes
- HR management and administration.
- The smooth operation of any employee insurance policies or pension plans.
- Legal Requirements, in example, Court Orders and Acts of Parliament

Disclosures will only be made where lawful, necessary, and proportionate, including where required by law or where there is a substantial public interest justification.

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Data Security

Threeshires Ltd adopts procedures designed to maintain the security of data when it is stored and transported. More information can be found in the data transfer security policy, available from Threeshires Ltd HR Manager.

In addition, employees must:

- ensure that all files or written information of a confidential nature are stored in a secure manner and are only accessed by people who have a need and a right to access them
- ensure that all files or written information of a confidential nature are not left where they can be read by unauthorised people
- refrain from sending emails containing sensitive work-related information to their personal email address
- check regularly on the accuracy of data being entered into computers
- always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them
- use computer screen blanking to ensure that personal data is not left on screen when not in use.

Personal data relating to employees should not be kept or transported on laptops, USB sticks, or similar devices, unless authorised by Threeshires Ltd HR Manager and/or Threeshires Ltd Directors. Where personal data is recorded on any such device it should be protected by:

- ensuring that data is recorded on such devices only where absolutely necessary
- using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted
- ensuring that laptops or USB drives are not left lying around where they can be stolen.
- use computer screen blanking to ensure that personal data is not left on screen when not in use.

Failure to follow Threeshires Ltd.'s rules on data security may be dealt with via Threeshires Ltd.'s disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

Breach notification

Where a data breach is likely to result in a risk to the rights and freedoms of individuals, it will be reported to the Information Commissioner within 72 hours of Threeshires Ltd becoming aware of it and may be reported in more than one instalment.

Individuals will be informed directly in the event that the breach is likely to result in a high risk to the rights and freedoms of that individual.

If the breach is sufficient to warrant notification to the public, Threeshires Ltd will do so without undue delay.

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Training

New employees must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

The nominated data controller/auditors/protection officers for Threeshires Ltd are trained appropriately in their roles under data protection legislation.

All employees who need to use the computer system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and Threeshires Ltd of any potential lapses and breaches of Threeshires Ltd.'s policies and procedures.

Records

Threeshires Ltd keeps records of its processing activities including the purpose for the processing and retention periods in its HR data record. These records will be kept up to date so that they reflect current processing activities. Retention periods are defined within the company retention schedule maintained by the Compliance Manager.

Data Protection Lead

Threeshires Ltd has appointed an internal Data Protection Lead responsible for overseeing compliance with data protection obligations. Email: DPL@threeshires.com

Data Protection Compliance

The Threeshires Ltd Compliance Manager is Threeshires Ltd appointed Data Protection Lead in respect of its data, compliance and protection activities. Threeshires Ltd Compliance Manager can be contacted at Threeshires Ltd Head Office.

Procedure for review

This policy will be updated as necessary to reflect best practice or future amendments made to the UK General Data Protection Regulation (UK GDPR) 2018 and Data Protection Act (DPA) 2018.

This policy is non-contractual and may be amended by Threeshires Ltd from time to time.

Signature:

Name: Mr James Lloyd

Date:.....11/05/2026.....

Position: Managing Director

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