





















## 15 Protection of personal data

All personnel must comply with the following when working with personal data:

- Personal data must always be handled with care and must not be shared with any colleague or any third party without authorisation,
- Physical records must not be left unattended or in the view of unauthorised employees, agents, contractors, or other parties at any time and must not be removed from the business premises without authorisation,
- If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period, the user must lock the computer and screen before leaving it,
- All physical copies of personal data, along with any electronic copies stored on physical, removable media, should be stored securely in a locked filing cabinet, drawer, box or similar,
- All electronic copies of personal data are to be stored securely using passwords which are changed regularly, and which do not use words or phrases that can be easily guessed or otherwise compromised,
- Personal data must not be transferred to any device personally belonging to an employee or transferred or uploaded to any personal file sharing, storage, communication, or equivalent service (such as a personal cloud service),
- Personal data may only be transferred to devices belonging to agents, contractors, or other parties working on our behalf where the party in question has agreed to comply fully with the letter and spirit of this policy and the law (which may include demonstrating that all suitable technical and organisational measures have been taken or entering into a data processor contract),
- All personal data stored electronically shall be backed-up regularly and securely, and
- Under no circumstances must any passwords be written down or shared between any employees, agents, contractors, or other parties working on our behalf, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method.

## 16 Implementation and Policy Management

This procedure shall be reviewed annually and following any personal data breach by the CFO and DPO.

Signed

Charlie Gordon Lennox – CEO

Date: 31 January 2023

