



Policy Statement

General Data Protection

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General Data Protection Policy Statement

The policy

This Policy is a legal statement that specifies what Alan Wood & Partners (“the Company”) does with the personal data collected from users, along with how the data is processed and why.

The goal of this Data Protection Policy Statement is to depict the legal data protection aspects in one summarising document. It can also be used as the basis for statutory data protection inspections, e.g., by the customer within the scope of commissioned processing. This is not only to ensure compliance with the European General Data Protection Regulation (GDPR) but also to provide proof of compliance.

Aims of the policy

This Policy conforms to the Information Commissioners Office “7 Key Principles of General Data Protection”.

The Company will protect the privacy of individuals when handling any personal information and ensure the Company is compliant, as far as possible, with relevant data protection and privacy laws by adhering to the following principles:

- Be transparent about its collection, use and disclosure of personal information
- Collect and use personal information fairly and lawfully
- Only collect personal information that it requires and only keep it for as long as is necessary
- Keep personal information accurate and up to date
- Respect the privacy rights of individuals granted by privacy laws
- Keep personal information secure.

Delivery

In meeting the above stated aims the Company will:

- Have a Data Protection Officer who will oversee the implementation of this policy
- Commit to keep abreast of all applicable data protection/privacy laws of the jurisdictions in which we operate
- Take steps to provide appropriate training and support to ensure that all personnel are aware of our obligations under this Policy and follow our data protection procedures when handling the personal information of others
- Implement relevant security procedures and issue guidance to staff explaining their data protection and security obligations

- Ensure that when sharing personal information with third parties we do so only where necessary and seek assurances that the third party has adequate security procedures in place to protect such information
- Implement clear processes for individuals to raise concerns about how the company processes their personal information and for resolving any such concerns
- Ensure our privacy notices are clear, accessible and give sufficient information about how we use and share personal information and where personal information can be updated or corrected
- Conduct internal and external inspections in line with our ISO 9001:2015 Quality Management System
- Delete/destroy personal information no longer needed for its original business purpose in accordance with our retention and destruction policies and procedures, unless we have a legal obligation to retain personal information for a certain period
- Only transfer personal information outside jurisdiction to other associated companies in accordance with relevant legal requirements.

Data protection privacy notice (clients)

The Data Protection Privacy Notice (Clients) applies to anyone who is a client of Alan Wood & Partners. The Privacy Notice covers the personal information we collect in connection with each contract for the performance of services between us and you. Please refer to the separate full Data Protection Privacy Notice (Clients) for more detailed information of what we collect, how it is used, retained, our security arrangements and your rights.

This policy statement is to be read in conjunction with other Company Policies including but not limited to Cyber Security, Whistleblowing, Disciplinary and Capability.

The Managing Director, Board and Senior Management Team will ensure that this policy is used as the basis for the organisation and management of General Data Policy initiatives.

Employees have an obligation to comply with Alan Wood & Partners' processes and procedures that allow Alan Wood & Partners to fulfil its legal obligations. Employees who fail to fulfil or discharge their responsibilities satisfactorily may be subject to disciplinary action.

This policy applies to all people who perform services for or on behalf of Alan Wood & Partners, including all full and part-time employees, directors, agency staff / contractors and all persons employed by Alan Wood & Partners.

This policy has been produced for Alan Wood Partnership Limited T/A Alan Wood & Partners (AWP) and covers all of its regional offices.

This policy was approved by Alan Wood & Partners Board.

This policy is regularly reviewed in order to ensure its continuing suitability. As Managing Director of Alan Wood & Partners, I accept ultimate responsibility for the General Data Policy Policy Statement.



Mark Coates
Managing Director

Date: February 2024

Review Date: January 2025