



Data Protection Policy

Effective February 2022

A handwritten signature in white ink, reading 'A. Nevins', is located in the bottom right area of the page.

Signed,

Andrew Nevins

DIRECTOR & OPERATIONS
MANAGER



The [Data Protection Act 2018](#) exists provides a comprehensive and modern framework for data protection in the UK. It facilitates the secure transfer of information within the European Union in line with the [General Data Protection Regulation \(EU\) 2016](#).

The Act also regulates the processing of personal data; it protects the rights and privacy of all individuals, ensuring that access to the personal data related to them remains a fundamental right for each and every digital user.

Scope

Section 2.1 This policy applies to all personal data processed by GUTA Enterprise, Ltd. All persons shall comply with this policy and procedure, ensuring that data is collected, stored and handled in accordance with the [Data Protection Act 2018](#).

Data Protection Principles

Section 3.1 When processing personal data, GUTA Enterprise Ltd. ensures that all information is

- *used fairly, lawfully and transparently.* The company shall ensure that the legal basis for processing personal data is identified in advance and that all processing complies with law.
- *used for specified, explicit and legitimate purposes.* The company shall not do anything with the data collected that would not be expected given the content of the policy and the fair processing or privacy notice.
- *used in a way that is adequate, relevant and limited to carrying out necessary functions.* The company shall only collect and process the personal data that is required for purposes which have been identified in advance.
- *accurate and, where necessary, kept up to date.* The company shall ensure that all personal data collected or processed is accurate and, where possible, up to date.
- *kept for no longer than is necessary.* The company shall, after such a period, securely erase or delete the data in a way which protects the rights and privacy of the individual on which the data is held.
- *processed in a way which ensures appropriate security, including protection against unlawful or unauthorized processing, access, loss, destruction or damage.* We shall ensure that appropriate security measures are in place such as data kept in locked cabinets at all times, to ensure that personal data can only be accessed by those with a valid need for access and that it is held and transferred securely.

Data Storage

Section 4.1 All personal data which is held by the company must be kept securely and not disclosed to any unauthorized third parties. The company will ensure that personal data is only accessible to those who have a valid reason for needing such access.

Section 4.2 GUTA Enterprise Ltd. possesses the following security guidelines for proper data storage and privacy:

- Securing all physical personal data in a lockable cabinet with key-controlled access.
- Ensuring that paper printouts are inaccessible to unauthorized personnel.
- Shredding and safely disposing all paper copies of personal data which are no longer needed.
- Electronically protecting personal data with password-controlled access.
- Positioning any and all PCs and/or terminals displaying personal data out of the visibility of unauthorized personnel.
- Storing copies of personal data on predesignated drives and servers—all protected by approved security software and/or firewalls—not on personnel devices.

Data Access

Section 5.1 All individuals who are the subject of personal data held by GUTA Enterprise Ltd. are entitled to

- inquire what information the company holds on them and the reason(s) for holding this information.
- inquire how best to gain access to any information we hold.
- information on how we keep this information up to date.
- request that any incorrect or incomplete personal data be rectified.
- information on how the company is meeting its data protection obligations.

Disclosure of Data

Section 6.1 GUTA Enterprise Ltd. undertakes not to disclose personal data to unauthorized third parties, including family members, friends and government bodies.

Section 6.2 In some circumstances, legitimate disclosures may be made to law enforcement agencies. These disclosures will only occur with the consent of the individual.

Responsibility

Section 7.1 GUTA Enterprise Ltd. must ensure that all persons who handle personal data on the company's behalf maintain appropriate handling and processing protocol in accordance with company policy.

Section 7.2 The company must ensure that persons with access to data are made aware of their responsibilities under the policy and that they are adequately trained and supervised in their role.

Section 7.3 Such training is implemented to ensure that all persons who handle personal data are aware (a) how to collect and store personal data and (b) how to update records promptly and accurately.

Section 7.4 Breaching this policy may result in disciplinary action for misconduct, including dismissal. Obtaining personal data, including accessing or disclosing personal data, is a breach of data protection policies and may also be a criminal offence.

Review and Monitoring

Section 8.1 It is the responsibility of the Management to ensure that the policy actions outlined herein are successfully implemented across the company, providing regular updates to stakeholders and monitoring its continued effectiveness. GUTA Enterprise Ltd. will review this policy annually as part of the management reviews.