

---

## DAMASCO DATA PROTECTION POLICY

---

### Introduction

This is the Data Protection Policy for Damasco (UK) Ltd (Damasco). During normal business activities, Damasco collects, stores and processes a variety of types of personal information. Damasco recognises the need to treat such information in a secure and lawful manner.

Damasco is committed to conducting its business in accordance with all applicable Data Protection laws and regulations, to being transparent about how it collects and uses the personal data of its employees, customers and clients, and to meeting its data protection obligations. This policy sets out Damasco's commitment to data protection, and individual rights and obligations in relation to personal data.

This policy applies to all cases where Damasco processes a data subject's personal data either in electronic form or where it is held in manual files that are structured in a way that allows ready access to information about individuals. It applies to the personal data of job applicants, employees, clients and other personal data processed for business purposes.

Damasco has appointed Mark Reid, Managing Director, as Data Protection Officer. He can be contacted at [dpo@damasco.co.uk](mailto:dpo@damasco.co.uk). Questions about this policy, or requests for further information, should be directed to him.

### Definitions

**"Personal data"** is any information that relates to an individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

**"Special categories of personal data"** means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

**"Criminal records data"** means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

### Data Protection Principles

Damasco will process personal data in accordance with the following data protection principles:

- personal data will be processed lawfully, fairly and in a transparent manner;

- personal data will be collected only for specified, explicit and legitimate purposes;
- personal data will be processed only where it is adequate, relevant and limited to what is necessary for the purposes of processing;
- personal data records will be kept accurate and up to date and all reasonable steps will be taken to ensure that inaccurate personal data is rectified or deleted without delay;
- personal data will be retained only for the period necessary for processing. The periods for which Damasco holds personal data are contained in its privacy notices to individuals.
- appropriate measures will be adopted to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

Damasco will inform individuals of the reasons for processing their personal data, how it uses such data and the legal basis for processing via its privacy notices. It will not process personal data of individuals for other reasons.

Damasco keeps a record of its processing activities in respect of personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

## Subject Access Requests

Individuals have the right to make a subject access request. If an individual makes a subject access request, Damasco will tell him/her:

- whether his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- to whom his/her data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- for how long his/her personal data is stored (or how that period is decided);
- his/her rights to rectification or erasure of data, or to restrict or object to processing;
- his/her right to complain to the Information Commissioner if he/she thinks Damasco has failed to comply with his/her data protection rights; and
- whether Damasco carries out automated decision-making and the logic involved in any such decision-making.

Damasco will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

To make a subject access request, the individual should follow the instructions in the associated privacy notices. In some cases, Damasco may need to ask for proof of identification before the request can be processed. Damasco will inform the individual if it needs to verify his/her identity and the documents it requires.

Damasco will normally respond to a request within a period of one month from the date it is received. In some cases, such as where Damasco processes large amounts of the individual's data, it may respond within three months of the date the request is received. Damasco will write to the individual within one month of receiving the original request to tell him/her if this is the case.

If a subject access request is manifestly unfounded or excessive, Damasco is not obliged to comply with it. Alternatively, Damasco may agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. If an individual submits a request that is unfounded or excessive, Damasco will notify him/her that this is the case and whether it will respond to it.

#### Other Individual Rights

Individuals have other rights in relation to their personal data. They can require Damasco to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;
- stop processing or erase data if the individual's interests override Damasco's legitimate grounds for processing data (where Damasco relies on its legitimate interests as a reason for processing data);
- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether the individual's interests override Damasco's legitimate grounds for processing data.

To ask Damasco to take any of these steps, the individual should follow the instructions in the associated privacy notices.

## Complaints Handling

Data subjects with a complaint about the processing of their personal data, should put forward the matter in writing to the Data Protection Officer. An investigation of the complaint will be carried out to the extent that is appropriate based on the merits of the specific case. The Data Protection Officer will inform the data subject of the progress and the outcome of the complaint within a reasonable period. If the issue cannot be resolved through consultation between the data subject and the Data Protection Officer, then the data subject may, at their option, seek redress through mediation, binding arbitration, litigation, or via complaint to the Data Protection Authority within the applicable jurisdiction.

## Data Security

Damasco takes the security of personal data seriously. It will adopt physical, technical, and organisational measures to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Where Damasco engages third parties to process personal data on its behalf, such parties do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data in line with prevailing data protection legislation and guidance from the Information Commissioner.

Damasco Entity will enter into an adequate processing agreement with the third party. The agreement must require the data processor to protect the personal data from further disclosure and to only process personal data in compliance with Damasco instructions. In addition, the data processor will be required to implement appropriate technical and organisational measures to protect the personal data, procedures for providing notification of personal data breaches, and submit to audits and inspections by the data controller.

## Impact Assessments

Some of the processing that Damasco carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, Damasco will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the measures that can be put in place to mitigate those risks.

## Data Breaches

A personal data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. If Damasco discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. Damasco will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

## Individual Responsibilities

Individuals are responsible for helping Damasco keep their personal data up to date. Individuals should let Damasco know if data provided to Damasco changes, for example if an individual moves to a new house or changes his/her bank details.

Individuals may have access to the personal data of other individuals, customers and clients during their employment. Where this is the case, Damasco relies on individuals to help meet its data protection obligations.

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside Damasco) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from Damasco's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for work purposes.

Further details about Damasco's security procedures can be found in its Information Security Policy.

Any member of staff who considers that this policy has not been followed in respect of personal data about themselves or others should raise the matter directly with a Damasco Director.

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under Damasco's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal.

## Training

Training will be provided to all individuals covering their data protection responsibilities as part of the induction process and at regular intervals thereafter.

Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.

## Policy Maintenance

The Data Protection Officer is responsible for the maintenance and accuracy of this policy. It will be reviewed and updated at least annually, in response to a specific incident or when legislative requirements have changed. All changes to this policy are approved by the Managing Director. This policy shall be made available to all Damasco employees.