



Data Protection Policy

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Context and overview

Key Details

- Policy prepared by: Andrew Smart
- Approved by board / management on: 25th February 2025
- Policy became operational on: 25th February 2025
- Next review date: 24th February 2026

Introduction

Principal Project & Management (NE) Limited is committed to protecting the privacy and security of personal data. This Data Protection Policy outlines the principles and guidelines for ensuring the lawful, fair, and transparent processing of personal data in compliance with the UK Data Protection Act 2018 (DPA 2018), the UK General Data Protection Regulation (UK GDPR), and other applicable data protection laws. We value our customers, employees, and partners, and this policy demonstrates our commitment to safeguarding their personal information.

Why this policy exists

The purpose of this policy is to:

- Ensure that personal data is processed lawfully, transparently, and securely.
- Comply with the data protection principles set out in the UK GDPR and the DPA 2018.
- Protect the rights of data subjects.
- Provide guidance to staff, contractors, and third-party service providers on handling personal data.

Scope

This policy applies to all employees, contractors, third-party vendors, and any other parties who handle personal data on behalf of Principal Project & Management (NE) Limited. It covers all forms of personal data, including paper records, electronic data, and any other data format.

Data Protection Principles

In accordance with the UK GDPR, Principal Project & Management (NE) Limited adheres to the following principles when processing personal data:

- **Lawfulness, fairness, and transparency:** Personal data must be processed lawfully, fairly, and transparently.
- **Purpose limitation:** Personal data must be collected for specified, legitimate purposes and not further processed in ways incompatible with those purposes.
- **Data minimisation:** Personal data should be adequate, relevant, and limited to what is necessary for the purpose it is processed.
- **Accuracy:** Personal data must be accurate and kept up to date.
- **Storage limitation:** Personal data should be kept in a form that allows identification of data subjects for no longer than necessary.
- **Integrity and confidentiality:** Personal data must be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.

Roles and Responsibilities

- **Data Protection Officer (DPO):** Principal Project & Management (NE) Limited has appointed an internal Data Protection Officer (DPO) responsible for overseeing compliance with data protection laws and ensuring this policy is implemented effectively. The DPO will be the main point of contact for data protection queries.

- **Employees and Contractors:** All employees and contractors must ensure that they comply with the principles of this policy, attend training sessions, and report any data protection concerns or breaches to the DPO.
- **Third-Party Providers:** When third-party vendors or partners process personal data on behalf of Principal Project & Management (NE) Limited, we ensure that appropriate contracts and data processing agreements (DPAs) are in place to guarantee compliance with data protection laws.

Data Collection and Use

Principal Project & Management (NE) Limited collects and processes personal data for various purposes, including:

- Providing products and services to clients
- Employee administration and payroll
- Marketing and communication activities
- Complying with legal and regulatory obligations
- Contractual performance

Personal data will only be collected for specific, legitimate purposes and will not be further processed in ways incompatible with those purposes.

Data Subject Rights

Under the UK GDPR, individuals have the following rights regarding their personal data:

- **Right to Access:** Individuals have the right to request access to the personal data we hold about them.
- **Right to Rectification:** Individuals can request correction of any inaccurate or incomplete data we hold.
- **Right to Erasure:** Individuals can request that their personal data be erased under certain circumstances, such as when the data is no longer necessary for the purpose it was collected.
- **Right to Restriction of Processing:** Individuals can request that we restrict the processing of their personal data under certain conditions.
- **Right to Data Portability:** Individuals can request a copy of their personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** Individuals can object to the processing of their personal data, particularly in cases of direct marketing or processing based on legitimate interests.
- **Right to Withdraw Consent:** When processing is based on consent, individuals can withdraw their consent at any time.

Requests to exercise these rights should be directed to the Data Protection Officer.

Data Security

Principal Project & Management (NE) Limited is committed to maintaining the security of personal data and preventing unauthorised access, loss, or destruction. We implement appropriate technical and organizational measures, including:

- Data encryption
- Access control mechanisms (e.g., passwords, two-factor authentication)
- Regular security audits and risk assessments
- Employee training on data protection and security best practices

Data Retention

Personal data will not be kept for longer than necessary to fulfil the purpose for which it was collected. Principal Project & Management (NE) Limited follows a data retention policy to determine how long personal data is stored, based on legal, contractual, or business requirements. Once personal data is no longer required, it will be securely deleted or anonymised.

Data Breach Management

In the event of a data breach that may result in a risk to individuals' rights and freedoms, Principal Project & Management (NE) Limited will:

- Notify the Information Commissioner's Office (ICO) within 72 hours if required under the UK GDPR.
- Inform affected individuals without undue delay, where appropriate.
- Take immediate action to mitigate the impact of the breach and prevent future occurrences.

Third-Party Providers

When personal data is processed by third-party service providers, we will ensure that appropriate data protection agreements (DPAs) are in place to ensure that third parties comply with the requirements of the UK GDPR. Third parties must implement appropriate safeguards to protect personal data and limit their use of data to the specific purpose for which it was provided.

Employee Training

All employees and contractors will receive regular training on data protection principles, the importance of safeguarding personal data, and how to identify and report potential data protection breaches.

Monitoring and Compliance

Principal Project & Management (NE) Limited will regularly audit its data processing activities and review this policy to ensure compliance with the UK GDPR and the DPA 2018. We will also assess the effectiveness of our data protection measures and update them as needed.

Review of Policy

This policy will be reviewed at least annually or whenever there is a significant change in data protection law or our operations. Any updates will be communicated to relevant stakeholders.

Contact Information

For any questions or concerns regarding this policy or data protection practices, or to exercise your rights under the UK GDPR, please contact:

Principal Project & Management (NE) Limited

Andrew Smart

Redheugh House, Thornaby Place, Thornaby, TS17 6SG

info@principalproject.co.uk

01642639988