

DATA PROTECTION STATEMENT

Our Commitment to Data Protection

At Blue Circle Surveyors Ltd, we are committed to safeguarding the privacy and personal data of our clients, employees, suppliers, and other stakeholders. We ensure that all personal data is handled securely and in compliance with the General Data Protection Regulation (GDPR) 2018 and the Data Protection Act 2018.

This statement outlines our approach to managing, processing, and protecting personal data responsibly and lawfully.

Our Data Protection Policy

This policy applies to all employees, consultants, contractors, and third parties processing personal data on behalf of Blue Circle Surveyors Ltd. We ensure compliance by adhering to the following principles:

- **Lawfulness, Fairness, and Transparency:** Personal data is processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Data is only collected for specified and legitimate business purposes.
- **Data Minimisation:** Only necessary data is collected and retained.
- **Accuracy:** Reasonable steps are taken to keep data accurate and up to date.
- **Storage Limitation:** Data is retained only for as long as necessary for business and legal purposes.
- **Security & Confidentiality:** Strong security measures are in place to protect personal data.
- **Accountability:** We take responsibility for ensuring compliance with data protection laws.

Data Security & Processing

To ensure robust data protection, we implement the following measures:

- **Encryption of sensitive data** to prevent unauthorised access.
- **Access controls and authentication** to restrict data handling to authorised personnel.
- **Regular security audits** to identify vulnerabilities and strengthen protections.
- **Employee training on data protection** to ensure compliance and awareness.
- **Secure disposal of data** when no longer required, including shredding and digital wiping.

Legal Basis for Processing Personal Data

We process personal data only when there is a lawful basis to do so, including:

- **Consent** from the data subject (e.g., client marketing preferences).
- **Contractual necessity** (e.g., processing employee or client contract data).
- **Legal obligations** (e.g., compliance with tax and employment laws).
- **Legitimate business interests**, where processing is necessary for operational efficiency.

Data Subject Rights



Individuals whose data we process have the right to:

- **Access** their personal data.
- **Rectify** inaccurate or incomplete data.
- **Request erasure** (Right to be Forgotten) in certain cases.
- **Restrict processing** under specific conditions.
- **Data portability** where applicable.
- **Object to processing** for marketing or other specified reasons.

Requests regarding data rights should be directed to the Data Protection Officer (DPO).

Data Sharing & Third-Party Processors

We do not share personal data with third parties unless:

- The data subject has provided explicit consent.
- It is required by law.
- It is necessary to fulfil contractual obligations.
- Third-party processors meet GDPR compliance standards.

Data Breach Notification

In the event of a data breach, we will:

- Notify the Information Commissioner's Office (ICO) within 72 hours if required.
- Inform affected individuals if there is a significant risk to their rights and freedoms.
- Investigate and take corrective action to prevent future breaches.

Training & Compliance

All employees handling personal data receive regular training on data protection principles and best practices.

Monitoring and Review

Our Data Protection Policy will be reviewed annually or more frequently as needed to ensure continued compliance with GDPR and the Data Protection Act 2018.

This statement does not form part of any employee's contract of employment or any contract with third parties and may be amended at any time.

Approved by:

Nick Medlock
Director & Data Protection Officer (DPO) – Blue Circle Surveyors Ltd
Date: 05/02/2025

