

# Data Protection Policy

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## Principles

In order to operate effectively and fulfil its legal obligations, Stewart Signs Limited needs to collect, maintain and use certain personal information about current, past and prospective employees, customers, suppliers and other individuals with whom it has dealings.

All such personal information, whether held on computer, paper or other media, will be obtained, handled, processed, transported and stored lawfully and correctly, in accordance with the safeguards contained in the Data Protection Act 2018 (DPA), EU- General Data Protection Regulation (GDPR) 2016/679 (GDPR) and any other relevant current legislation.

Stewart Signs Limited is committed to the principles of data protection as detailed in the DPA/GDPR.

## Compliance

In order to comply with the data protection principles, Stewart Signs Limited has created policies and procedures to meet these requirements. The Stewart Signs Ltd Privacy Statement is published on the Stewart Signs website. This details how personal data will be handled. The IT Security Policy and other documents referred to within that policy manages the handling of all data, including payment card data, throughout the organization. These documents are not available for public distribution but may be viewed at our site by appointment.

Stewart Signs maintains that it will meet compliance with all aspects including the examples below:

- observe fully all conditions regarding the fair collection and use of personal information;
- meet its legal obligations to specify the purpose for which information is used;
- collect and process appropriate personal information only to the extent that it is needed to fulfil operational needs or to comply with legal obligations;
- handle data in accordance with the requirements of a Data Controller, Data Processor or Sub Processor as may be relevant
- ensure the quality of the personal information used;
- apply strict checks to determine the length of time personal information is held;
- ensure that individuals about whom information is held are able to exercise their rights under the GDPR/DPA, including the right to be informed that processing is taking place, the right of access to their own personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase incorrect or no longer needed information;
- take appropriate technical and organisational security measures to safeguard personal information;
- ensure that personal information is not transferred outside the EEA without suitable safeguards.

## Responsibilities

- Overall responsibility for ensuring that the Company complies with its data protection obligations rests with the QHSE Director.
- It is the responsibility of all employees to ensure that personal information provided to the Company, for example current address, is accurate and up to date. To this end employees are required to inform the Company immediately when changes occur.
- Employees whose role involves the collection, maintenance and processing of data including personal information about other employees, customers, suppliers or any other individuals with whom the Company has dealings are responsible for following the Company's rules on good data protection practice as notified by their Manager or directly from the QHSE Director.

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## Information about Data Subjects

Stewart Signs Limited procures positive consent for the information that is handled as described in the Privacy Statement. Anyone who is the subject of personal information held by the Company has the right to make a subject access request. Details are in the Privacy Statement. The Company will deal promptly with subject access requests and will normally respond within the timeframe specified by the GDPR.

## Breach of the policy

Breach of this policy will be dealt with under the Company's IT Security Policy and Data Breach procedures.

Employees have been trained in all aspects of Data Protection requirements that relate to Stewart Signs Ltd.

Signed



(QHSE Director)

Date: 25.05.18