

# **Data Protection & UK GDPR Policy**

## **1. Purpose of this Policy**

Kew Computers Ltd collects and uses personal data about customers, staff, suppliers and other contacts.

We are committed to handling this data responsibly, securely and in compliance with UK GDPR and the Data Protection Act 2018.

## **2. Our commitments**

We will:

- Process personal data lawfully, fairly and transparently
- Collect only the data we need
- Keep data accurate and up to date
- Store data securely
- Keep data only as long as necessary
- Respect individuals' rights over their personal data.

## **3. What data we process**

This may include names, addresses, phone numbers, email addresses and other information needed to provide our services.

## **4. Legal bases for processing**

We process data under one or more of the following lawful bases:

- Consent
- Performance of a contract
- Legal obligation
- Vital interests
- Public interest
- Legitimate interests (balanced against the individual's rights).

## **5. Responsibilities**

- Directors oversee compliance with UK GDPR
- Data Protection Lead manages day-to-day data protection, responds to requests and ensures policies remain up to date
- All staff and contractors must follow this policy and handle data securely.

## **6. Data security**

We take appropriate technical and organisational measures to protect data, including:

- Secure systems, passwords, firewalls and anti-malware protection
- Secure handling of paper records

- Regular data backups
- Access limited to staff who need the data for their work
- Secure disposal of data no longer required.

## **7. Data accuracy & retention**

We aim to keep data accurate and current. Data will be retained only for as long as necessary for legal, operational or contractual reasons, after which it will be securely deleted.

## **8. Individual rights**

Individuals have the right to:

- Access their data
- Request correction
- Request deletion (where appropriate)
- Object to or restrict processing
- Data portability

Subject Access Requests (SARs) can be made by email.

We will respond within one month (extendable by two months for complex requests).

We do not normally charge a fee unless the request is excessive.

## **9. Data sharing**

We do not share personal data with third parties unless:

- It is necessary to fulfil a contract
- We have a legal obligation
- We have consent
- We use approved and secure third-party services (eg., cloud platforms).

Any sharing is minimal and carried out securely.

## **10. Data breaches**

Any suspected or actual data breach will be investigated immediately. Where required, we will notify the ICO and affected individuals in line with UK GDPR requirements.

## **11. Law enforcement requests**

Data may be disclosed to law enforcement agencies where legally required. We will only provide information that is necessary and legitimate.

## **12. Review**

This policy is reviewed annually or whenever relevant legislation or operational processes change.

Approved by:

Director, Kew Computers Ltd

Date: 2025

(Reviewed annually)