

Hambleton INTERIORS

GDPR Policy 2023

1.0 Purpose and Scope

This policy provides a framework for ensuring that Hambleton Interiors meets its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 18). It applies to all the processing of personal data carried out by the ICO including processing carried out by joint controllers, contractors, and processors.

Hambleton Interiors complies with data protection legislation guided by the six data protection principles. In summary, they require that personal data is:

- processed fairly, lawfully and in a transparent manner.
- used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes.
- adequate, relevant, and limited to what is necessary.
- accurate and, where necessary, up to date.
- not kept for longer than necessary; and
- kept safe and secure.

In addition, the accountability principle requires us to be able to evidence our compliance with the above six principles and make sure that we do not put individuals at risk because of processing their personal data. Failure to do so, can result in breach of legislation, reputational damage, or financial implications due to fines.

2.0 Information covered by Data Protection Legislation

The UK GDPR definition of "personal data" includes any information relating to an identified or identifiable natural living person. Pseudonymised personal data is covered by the legislation, however anonymised data is not regulated by the UK GDPR or DPA 18, providing the anonymisation has not been done in a reversible way. Some personal data is more sensitive and is afforded more protection, this is information related to:

- Race or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric ID data;
- Health data;
- Sexual life and/or sexual orientation; and
- Criminal data (convictions and offences)

3.0 Monitoring

Compliance with this policy will be monitored by the Managing Director and the responsible team within the organisation.