

WILLIAM TURNER

**Data  
Protection  
Policy**

June 2025

# Introduction

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William Turner Ltd is committed to protecting the personal data of all individuals whose information we hold. This includes customers, suppliers, business contacts, employees, and other stakeholders. This policy outlines how we collect, use, store, and manage personal data responsibly and lawfully, in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 2. Purpose of the Policy

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This policy is designed to ensure that William Turner Ltd:

- Complies fully with data protection laws and operates in line with industry best practice.
- Respects and protects the rights of individuals whose data we handle.
- Maintains transparency about how personal data is used and safeguarded.
- Mitigates the risk of data breaches or misuse of information.

## 3. Scope

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This policy applies to:

- All employees and departments of William Turner Ltd.
- Contractors, suppliers, and third-party service providers handling data on our behalf.
- All personal data processed by the company, whether in digital or physical form.

Examples of personal data include:

- Names, addresses, phone numbers, and email addresses
- Financial or transactional data
- Employment and HR records
- Any other identifiable information relating to a person

## 4. Key Data Protection Principles

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William Turner Ltd adheres to the core principles of data protection as outlined in the UK GDPR. Personal data must be:

1. Processed lawfully, fairly, and transparently
2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up to date
5. Kept no longer than necessary
6. Processed securely
7. Handled with accountability at all stages

## 5. Roles and Responsibilities

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- **Managing Director**  
Holds ultimate accountability for ensuring compliance with data protection law.  
  
**Data Protection Officer** (or designated Admin Lead)  
Responsible for:
  - Monitoring compliance and conducting regular policy reviews
  - Managing data subject access requests
  - Advising on data protection matters
  - Coordinating staff training and awareness
  - Evaluating data protection practices of third-party providers
  - Responding to incidents or breaches

- **All Employees**

Everyone is responsible for:

- Handling personal data in line with this policy and training received
- Reporting potential breaches or concerns immediately
- Only accessing data required for their role
- Keeping information secure at all times

## 6. Data Security

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### **For paper-based data:**

- Store in locked cabinets when not in use
- Dispose of via shredding or secure disposal when no longer needed
- Do not leave unattended in public or communal areas

### **For digital data:**

- Use strong, regularly updated passwords
  - Store only on secure company-approved systems
  - Back up regularly and test recovery processes
  - Never save data to personal devices or removable media
  - Use encrypted channels for data transfer
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## 7. Data Accuracy and Retention

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- Personal data must be reviewed and updated regularly
- Inaccurate or outdated data must be corrected or deleted promptly
- Data is retained only for as long as necessary to fulfil its purpose or meet legal obligations
- A formal retention schedule outlines timelines for data review and disposal

## 8. Data Subject Rights

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Under the UK GDPR, individuals have the right to:

- Request access to their data (subject access request)
- Correct or update inaccurate data
- Request erasure ('right to be forgotten')
- Object to data processing
- Restrict processing or data portability
- Lodge a complaint with the Information Commissioner's Office (ICO)
- Requests must be responded to within one month and directed to the Data Protection Officer.

## 9. Data Sharing and Transfers

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William Turner Ltd only shares personal data when:

- Legally required (e.g. with law enforcement)
- Necessary for delivering services (with appropriate safeguards in place)
- With informed consent from the data subject
- Cross-border data transfers outside the UK/EEA will only occur with appropriate safeguards (e.g., adequacy decisions or standard contractual clauses).

## 10. Data Breach Procedure

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A data breach (e.g., accidental loss, theft, or disclosure) must be reported immediately to the Data Protection Officer.

Depending on the severity, the breach may need to be reported to the ICO within 72 hours. Affected individuals will be notified where there is a high risk to their rights and freedoms.

# 11. Communication and Training

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- All staff receive regular data protection training appropriate to their role.
- The policy is made available to all employees, contractors, and third parties as required.
- Policy updates are communicated company-wide when changes occur.

# 12. Monitoring and Review

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- This policy will be reviewed annually or in response to significant legal or operational changes. Continuous improvement of our data handling and security procedures will be a priority.

Signed: .....  
Position: Managing Director  
Print Name: Bruce Freeland  
Date of Issue: .....

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