

Data Protection Policy

Last updated 9th December 2024

Definitions

DCS	means DCS Group (UK) Ltd, a company registered under UK company number 02580758
DPA	means the Data Protection Act 2018 which implements the EU's General Data Protection Regulation
Responsible Person	means Annabelle Mullard
Register of Systems	means a register of all systems or contexts in which personal data is processed by DCS

1. Introduction

DCS is committed to protecting the privacy and personal data of its employees, clients, partners, and any other individuals whose personal data it processes. This policy outlines our commitment to compliance with the DPA and our approach to data protection and privacy.

2. General provisions

This policy applies to all personal data processed by DCS, regardless of the format or medium in which it is stored or processed. It applies to all employees, contractors, and third parties who process personal data on behalf of DCS.

3. Data protection principles

DCS is committed to processing data in accordance with its responsibilities under the DPA.

DPA requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or

- historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
 - e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the DPA in order to safeguard the rights and freedoms of individuals; and
 - f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

4. General provisions

- a. This policy applies to all personal data processed by DCS.
- b. The Responsible Person shall take responsibility for DCS’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. DCS shall register with the Information Commissioner’s Office as an organisation that processes personal data.

5. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, DCS shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data, and any such requests made to DCS shall be dealt with in a timely manner.

6. Lawful purposes

- a. All data processed by DCS must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).

- b. DCS shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in DCS's systems.

7. Data minimisation

- a. DCS shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

8. Accuracy

- a. DCS shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

9. Archiving / removal

- a. To ensure personal data is retained only for as long as necessary, DCS has implemented an archiving procedure, SOP-G002, tailored to each area where personal data is processed. This procedure is reviewed annually to ensure ongoing relevance and compliance.
- b. The procedure outlines clear guidelines on what data must be retained and the retention period for each type of data.

10. Security

- a. DCS shall ensure that personal data is stored securely using modern software that is kept-up to date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted, this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

11. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal

data, DCS shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).