

## DATA PROTECTION POLICY

### 1. INTRODUCTION

This Data Protection Policy outlines the principles and guidelines that HMFS Consultants (HMFSC) follows to ensure compliance with data protection laws and regulations, particularly the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR). This policy applies to all employees, contractors, partners, and third parties who handle personal data on behalf of HMFSC.

### 2. PURPOSE

The purpose of this policy is to:

- Ensure the lawful, fair, and transparent processing of personal data.
- Protect the rights of individuals regarding their personal data.
- Establish procedures for the collection, storage, use, and disclosure of personal data.
- Provide guidelines for the secure handling of personal data.
- Ensure compliance with data protection laws and regulations.

### 3. SCOPE

This policy applies to all personal data collected, processed, stored, or transmitted by HMFSC, regardless of the format or medium. It covers all employees, contractors, partners, and third parties who handle personal data on behalf of the organisation.

### 4. PRINCIPLES

HMFSC is committed to upholding the following data protection principles:

**Lawfulness, fairness, and transparency:**

We will process personal data lawfully, fairly, and in a transparent manner.

**Purpose limitation:**

We will collect personal data for specified, explicit, and legitimate purposes and will not process it in a manner incompatible with those purposes.

**Data minimization:**

We will only collect and process personal data that is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

**Accuracy:**

We will ensure that personal data is accurate and, where necessary, kept up to date. We will take reasonable steps to rectify or erase inaccurate personal data without delay.

**Storage limitation:**

We will not keep personal data in a form that permits identification of individuals for longer than is necessary for the purposes for which the data is processed.

**Integrity and confidentiality:** We will process personal data in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

## 5. RESPONSIBILITIES

**Management:**

Management is responsible for implementing and enforcing this Data Protection Policy, providing resources for compliance efforts, and ensuring that employees receive adequate training on data protection.

**Employees:**

All employees are responsible for complying with this policy, handling personal data in accordance with applicable laws and regulations, and reporting any potential data breaches or violations to management.

**Data Protection Officer**

The Data Protection Officer is responsible for overseeing the organization's data protection compliance efforts, providing guidance on data protection matters, and serving as a point of contact for data subjects and regulatory authorities.

## 6. DATA COLLECTION AND PROCESSING

- We will only collect personal data for specified, explicit, and legitimate purposes, and we will inform individuals of the purposes for which their data is being collected.
- We will only process personal data if one or more lawful bases for processing apply, such as consent, contract performance, legal obligation, vital interests, public task, or legitimate interests.
- We will ensure that personal data is accurate and, where necessary, kept up to date. We will take reasonable steps to rectify or erase inaccurate personal data without delay.
- We will not keep personal data in a form that permits identification of individuals for longer than is necessary for the purposes for which the data is processed.

## 7. DATA SECURITY

- We will implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

- We will regularly review and update our security measures to ensure the ongoing confidentiality, integrity, and availability of personal data.
- We will provide training to employees on data security best practices and will enforce security policies and procedures to prevent unauthorized access to personal data.

## 8. DATA SUBJECT RIGHTS

- We will respect the rights of individuals regarding their personal data, including the right to access, rectification, erasure, restriction of processing, data portability, and objection to processing.
- We will promptly respond to data subject requests and will provide individuals with information about their rights and how to exercise them.

## 9. DATA BREACH RESPONSE

- We will promptly investigate any suspected or actual data breaches and will take appropriate steps to mitigate the impact of the breach and prevent future breaches.
- We will notify the relevant supervisory authority and affected individuals of any data breaches as required by law.

## 10. COMPLIANCE MONITORING AND REVIEW

- We will regularly monitor our compliance with this Data Protection Policy and applicable data protection laws and regulations.
- We will conduct periodic reviews and audits of our data processing activities, security measures, and data protection practices to ensure ongoing compliance and effectiveness.

## 11. POLICY UPDATES

- We reserve the right to update or amend this Data Protection Policy at any time to reflect changes in legal or regulatory requirements, best practices, or organizational needs.
- Any updates or amendments to this policy will be communicated to employees and other relevant parties as appropriate.

## 12. CONTACT INFORMATION

If you have any questions, concerns, or complaints regarding our data protection practices or this policy, please contact Noreen Moses / Steven Harkins (HMFSC)