

# HAWKESPUR LTD. DATA PROTECTION POLICY

## POLICY STATEMENT

Hawkespur Ltd needs to collect and use information about its employees, clients and other individuals who come into contact with the Company for a variety of purposes.

## PURPOSE & SCOPE

The purpose of this Policy is to provide guidance on the appropriate matters to consider when establishing data protection policies. The Policy applies to all employees, clients and suppliers of the Company and to all contractors and consultations who may have access to personal data in the course of fulfilling their duties.

## IMPLEMENTATION GUIDELINES

To meet the objectives outlined within the Policy Statement, the processing of personal data must comply with the six enforceable data protection principles of good practice. These provide that personal data must be:

- a) processed lawfully and fairly 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 legitimate archiving purposes and for 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 for legitimate, contract or archiving or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR 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 organisation measures.

## ROLES & RESPONSIBILITIES

The Manager of Hawkespur Ltd is responsible for making recommendations to the Company and for the implementation of adequate and appropriate data protection processes and procedures. These should also be made available to all relevant staff. The Manager is responsible for ensuring that this Policy is implemented and complied with. Relevant staff must receive training in this Policy, on their rights and responsibilities under the Policy and how the Policy affects the way they carry out their duties. Any questions regarding the implementation of this Policy should be referred to the Manager.

Hawkespur Ltd. 3 May 2018.