

**Global Associates**  
**DATA PROTECTION & PRIVACY POLICY v 1.0**  
**Document Owner:** Chief Executive Officer  
**Approved by:** Senior Management Team  
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## 1. Policy Statement

Global Associates is committed to protecting the privacy and personal data of employees, clients, suppliers and other stakeholders. The organisation processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Kind Regards



Paul Wetherfield  
CEO – Global Instrumentation Limited t/a global associates

## 2. Scope

This policy applies to all employees, directors, contractors, consultants and any third party processing personal data on behalf of Global Associates.

## 3. Personal Data

Personal data is any information relating to an identifiable individual. Examples include names, addresses, contact details, employment records, identification numbers and technical system access records.

## 4. Special Category Data

Certain personal data requires additional protection including information relating to health, racial or ethnic origin, religious beliefs, trade union membership, and criminal convictions or offences.

## 5. Data Protection Principles

Global Associates follows the core principles of UK GDPR:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

## 6. Lawful Basis for Processing

Personal data will only be processed where a lawful basis exists including contractual necessity, legal obligation, legitimate interests, or where consent has been obtained.

## 7. Data Security

Global Associates protects personal data through appropriate technical and organisational measures including secure IT systems, access controls, password protection, encryption where appropriate, and staff awareness training.

## 8. Data Breaches

Any suspected data breach must be reported immediately to senior management. Where required, breaches will be reported to the Information Commissioner's Office (ICO) in accordance with UK GDPR requirements.

## 9. Employee Responsibilities

Employees must handle personal data responsibly, protect confidential information, avoid unauthorised disclosure and follow company IT security procedures.

## 10. Individual Rights

Individuals whose data is processed have rights including access to their personal data, correction of inaccurate information, restriction of processing, erasure where appropriate, data portability and the right to object to certain processing activities.

## 11. Data Retention

Personal data will only be retained for as long as necessary to fulfil legal, contractual or operational requirements. Retention periods will be reviewed periodically.