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| POLICY NAME:     | GDPR     | DATE:   | JANUARY 2026   |
| POLICY REVISION: | 01       | BY      | JONATHAN CLARK |
| REVIEW PERIOD:   | ANNUALLY | REVIEW: | JANUARY 2027   |



# GDPR POLICY



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## 1. AMENDMENTS AND UPDATES

| ISSUE | DATE     | AMENDMENT / CHANGE |
|-------|----------|--------------------|
| FIRST | Jan 2026 |                    |
|       |          |                    |
|       |          |                    |
|       |          |                    |
|       |          |                    |
|       |          |                    |

## 2. PURPOSE

The purpose of this policy is to define Glass and Framing Solutions Limited's commitment to comply with the UK GDPR and the Data Protection Act 2018. It aims to protect the rights of individuals (data subjects) and provide a framework for the secure and legal processing of personal data.

## 3. SCOPE

This policy applies to all personal data processed by Glass and Framing Solutions Limited, whether held electronically or in manual filing systems. It applies to:

- All employees, contractors, and third-party partners acting on behalf of Glass and Framing Solutions Limited.

## 4. DEFINITIONS

- **Personal Data:** Any information relating to an identified or identifiable living individual (e.g. Name, ID number, location data).
- **Special Category Data:** Sensitive data requiring higher protection (e.g. Health data, trade union membership, ethnic origin).
- **Data Controller:** Glass and Framing Solutions Limited, which determines the purposes and means of processing data.
- **Data Subject:** The individual to whom the personal data relates.

## 5. POLICY STATEMENT

Glass and Framing Solutions Limited is committed to processing data in accordance with the seven core principles of the UK GDPR:

- **Lawfulness, fairness, and transparency.**
- **Purpose limitation** (Only collect what is needed).
- **Data minimisation** (Keep only what is necessary).
- **Accuracy.**
- **Storage limitation** (Don't keep forever).
- **Integrity and confidentiality** (Security).
- **Accountability.**

## 6. RESPONSIBILITIES

- **Directors:** Overall responsibility for ensuring legal compliance.
- **Data Protection Lead:** Responsible for monitoring compliance and acting as a point of contact for the ICO (Information Commissioner's Office).
- **Department Managers:** Ensuring their teams follow secure data practices.
- **All Staff:** Responsible for following security protocols and reporting any data breaches immediately.

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## 7. DATA SUBJECT RIGHTS

We recognise and support the rights of individuals to:

- Request access to their data (Subject Access Request).
- Rectify inaccurate information.
- Request erasure (“the right to be forgotten”) where applicable.
- Object to or restrict certain types of processing.

## 8. DATA SECURITY AND BREACH REPORTING

Glass and Framing Solutions Limited promotes an open and accountable culture.

- **Security:** We implement technical measures (AbilityIT - Live monitoring, encryption, firewalls) and organisational measures (e.g. Clean desk policy, locked cabinets) to protect data.
- **Breach Procedure:** Any suspected data breach must be reported to the Data Protection Lead immediately, who will in turn if digital related liaise directly with AbilityIT. If the breach poses a risk to individuals, we will notify the ICO within 72 hours.

## 9. SURVEILLANCE AND CCTV

As part of our commitment to safety and security, Glass and Framing Solutions Limited operates a Closed-Circuit Television (CCTV) system across our manufacturing facilities.

- **Purpose:** CCTV is used strictly for the purposes of crime prevention, site security, and health and safety (e.g. Monitoring hazardous machinery or incident investigations).
- **Transparency:** Clear and prominent signage is displayed at all entry points and provide contact details for the Data Protection Lead.
- **Data Minimisation:** Cameras are positioned to avoid capturing areas where individuals have a high expectation of privacy (e.g. Toilets, changing rooms, or designated break areas).
- **Retention:** CCTV footage is typically retained for a period of 30 days, after which it is automatically overwritten, unless required for an ongoing investigation.
- **Access:** Access to live feeds and recorded footage is restricted to authorised personnel and is protected by secure passwords / encryption.

## 10. SUPPLIER AND THIRD-PARTY DATA

We engage with various suppliers and contractors to maintain our manufacturing operations. This necessitates the processing of personal data (e.g. Contact names, business emails, and location data).

- **Due Diligence:** Before engaging any new supplier, who will process personal data on our behalf, we conduct a Data Protection Impact Assessment (DPIA) or a security vetting process to ensure they provide sufficient guarantees under the UK GDPR.
- **Contractual Safeguards:** All supplier agreements must include a Data Processing Agreement (DPA) or standard contractual clauses. These ensure the supplier:
  - Only processes data on our written instructions.
  - Maintains robust technical and organisational security measures.
  - Notifies Glass and Framing Solutions Limited of any data breach with 48 hours.
- **Data Sharing:** We only share the minimum amount of data necessary for the supplier to fulfil their contract (e.g. Delivery driver names for site access).
- **Audits:** We reserve the right to audit our suppliers’ data protection practices to ensure ongoing compliance with this policy.

## 11. RETENTION AND DISPOSAL

Personal data shall not be kept longer than is necessary for the purposes for which it was collected. Specific retention periods are outlined in our Data Retention Schedule. Disposal of physical records must be via secure shredding.

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## 12. DATA RETENTION SCHEDULE

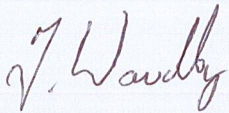
White some time periods are mandated by law, others are based on 'limitation periods', are retention periods are:

| CATEGORY            | Retention Period        | Legal Basis                           |
|---------------------|-------------------------|---------------------------------------|
| Financial / Tax     | 6 Years + Current Year  | Taxes Management Act 1970             |
| Employee Files      | 6 Years Post-Employment | Limitation Act 1980 (Contract Claims) |
| Payroll Records     | 6 Years                 | MRC / Social Security Regulations     |
| Job Applications    | 6 Months                | Equality Act (Discrimination Claims)  |
| Contracts           | 6 Years After Expiry    | Limitation Act 1980                   |
| Accident Reports    | 6 Years                 | Social Security / Health & Safety     |
| Health Surveillance | 40 Years                | COSHH (Hazardous Substances)          |

## 13. REVIEW AND CONTINUOUS IMPROVEMENT

This policy will be:

- Reviewed annually by Senior Management or more frequently if legislation or business operations change.
- Updated as necessary to ensure continued compliance and effectiveness.
- Supported by periodic audits and feedback mechanisms to identify and address potential weaknesses.

|             |                                                                                   |
|-------------|-----------------------------------------------------------------------------------|
| SIGNED:     |  |
| NAME:       | Tony Waudby                                                                       |
| TITLE:      | Managing Director                                                                 |
| SIGNED FOR: | Glass and Framing Solutions Limited                                               |
| DATE:       | 15 <sup>th</sup> January 2026                                                     |

