





DATA PROTECTION POLICY

AMENDMENT HISTORY						
This document is reviewed periodically, at least annually, and is retained for a period of six years. Amendments and revisions are distributed by the named holder. The history of amendments and the issue of revisions are recorded below.						
ISS	REV	DESCRIPTION	PREPARED	APPROVED & AUTHORIZED	SIGNED	ISSUE DATE
01	00	First Issue	David Wright	Marcel Madden Managing Director		06/10/2021
02	00	Policy Update	David Wright	Marcel Madden Managing Director		06/09/2022
03	00	Policy Review	David Wright	Marcel Madden Managing Director		26/01/2024

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	CONFIDENTIALITY LEVEL CONTROLLED: UNCONTROLLED IF PRINTED	ISSUE DATE 26/01/2024	SHEET 1 of 12	REV 00

GDPR: The content of this document is Private & Confidential.



The Information Commissioner's Office in the United Kingdom is a non-departmental public body which reports directly to Parliament and is sponsored by the Department for Digital, Culture, Media and Sport.

1. Narrative


1.1. Delta Matrix Limited ("the Company").

1.2. This Data Protection Policy has been compiled (for and on behalf of the Company) by Dr D Wright (07736 696105) Quality, Safety and Paralegal Fellow in consultation with the Company's Data Protection Officer who is Mr M Madden a full-time employee of the Company. He can be contacted on 01642 955839.

2. Introduction

2.1. This Privacy Standard sets out how "the Company" handle the Personal Data of our customers, suppliers, employees, workers and other third parties.

2.2. This Privacy Standard applies to all Personal Data we process regardless of the media on which that data is stored or whether it relates to past or present employees, workers, customers, clients or supplier contacts, shareholders, website users or any other Data Subject.

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2.3. This Privacy Standard sets out what we expect from you in order for the Company to comply with applicable law.

2.4. Your compliance with this Privacy Standard is mandatory. Related Policies are available to help you interpret and act in accordance with this Privacy Standard. You must also comply with all such Related Policies. Any breach of this Privacy Standard may result in disciplinary action.

2.5. This Privacy Standard (together with Related Policies excluding the Website Privacy Policy) is an internal document and cannot be shared with third parties, clients or regulators without prior authorisation from our Privacy Officer.


3. Scope

3.1. We recognise that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we always take seriously. The Company is exposed to potential fines of up to EUR20 million (approximately £18 million) or 4% of total worldwide annual turnover, whichever is higher and depending on the breach, for failure to comply with the provisions of the GDPR.

3.2. All managers are responsible for ensuring all Company Personnel comply with this Privacy Standard and need to implement appropriate practices, processes, controls and training to ensure such compliance.

3.3. Please contact the Privacy Officer with any questions about the operation of this Privacy Standard or the GDPR or if you have any concerns that this Privacy Standard is not being or has not been followed. You must always contact the Privacy Officer in the following circumstances:

- (a) if you are unsure of the lawful basis which you are relying on to process Personal Data (including the legitimate interests used by the Company).
- (b) if you need to rely on Consent and/or need to capture Explicit Consent.
- (c) if you are unsure about the retention period for the Personal Data being.
- (d) if you are unsure about what security or other measures you need to implement to protect Personal Data.
- (e) if there has been a Personal Data Breach.
- (f) if you are unsure on what basis to transfer Personal Data outside the EEA.
- (g) if you need any assistance dealing with any rights invoked by a Data Subject.
- (h) whenever you are engaging in a significant new, or change in, Processing activity which is likely to require a DPIA or plan to use Personal Data for purposes others than what it was collected for.
- (i) If you need help complying with applicable law when carrying out direct marketing activities or
- (j) if you need help with any contracts or other areas in relation to sharing Personal Data with third parties (including our vendors) Personal Data protection principles.

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3.4. We adhere to the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:

- (a) processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
- (b) collected only for specified, explicit and legitimate purposes (Purpose Limitation).
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).
- (d) accurate and where necessary kept up to date (Accuracy).
- (e) not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
- (f) processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
- (g) not transferred to another country without appropriate safeguards being in place (Transfer Limitation).
- (h) made available to Data Subjects and Data Subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).

3.5. We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).


4. Personal Data Protection Principles



The GDPR outlines six data protection principles you must comply with when processing personal data. These principles relate to: Lawfulness, fairness and transparency - you must process personal data lawfully, fairly and in a transparent manner in relation to the data subject.

4.1. We adhere to the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:

- (a) processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
- (b) collected only for specified, explicit and legitimate purposes (Purpose Limitation).
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).
- (d) accurate and where necessary kept up to date (Accuracy).
- (e) not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
- (f) processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing

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and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).

- (g) not transferred to another country without appropriate safeguards being in place (Transfer Limitation).
- (h) made available to Data Subjects and Data Subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).

4.2. We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).

5. Lawfulness, Fairness and Transparency

5.1. Lawfulness and Fairness. Personal data must be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

5.1.1 You may only collect, process and share Personal Data fairly and lawfully and for specified purposes. The GDPR restricts our actions regarding Personal Data to specified lawful purposes. These restrictions are not intended to prevent Processing but ensure that we Process Personal Data fairly and without adversely affecting the Data Subject.

5.1.2 The GDPR allows Processing for specific purposes, some of which are set out below:

- (a) the Data Subject has given his or her Consent.
- (b) the Processing is necessary for the performance of a contract with the Data Subject.
- (c) to meet our legal compliance obligations.
- (d) to protect the Data Subject's vital interests; or
- (e) to pursue our legitimate interests for purposes where they are not overridden because the Processing prejudices the interests or fundamental rights and freedoms of Data Subjects. The purposes for which we process Personal Data for legitimate interests need to be set out in applicable Privacy Notices or Fair Processing Notices.


5.2. Consent. A Data Controller must only process Personal Data on the basis of one or more of the lawful bases set out in the GDPR, which include Consent.

5.2.1 Unless we can rely on another legal basis of Processing, Explicit Consent is usually required for Processing Sensitive Personal Data, and for cross border data transfers. Usually we will be relying on another legal basis (and not require Explicit Consent) to Process most types of Sensitive Data. Where Explicit Consent is required, you must issue a Fair Processing Notice to the Data Subject to capture Explicit Consent.

6. Transparency (Notifying Data Subjects)

6.1. The GDPR requires Data Controllers to provide detailed, specific information to Data Subjects depending on whether the information was collected directly from Data Subjects or from elsewhere. Such information must be provided through appropriate Privacy Notices or Fair Processing Notices which must be concise, transparent, intelligible, easily accessible, and in clear and plain language so that a Data Subject can easily understand them.

6.2. Whenever we collect Personal Data directly from Data Subjects, including for human resources or employment purposes, we must provide the Data Subject with all the information required by the GDPR including the identity of the Data Controller and Privacy

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Officer, how and why we will use, Process, disclose, protect and retain that Personal Data through a Fair Processing Notice which must be presented when the Data Subject first provides the Personal Data.

7. Purpose Limitation

7.1. Personal Data must be collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.

7.2. You cannot use Personal Data for new, different or incompatible purposes from that disclosed when it was first obtained unless you have informed the Data Subject of the new purposes and they have consented where necessary.

8. Data Minimisation

8.1. Personal Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

8.2. You may only Process Personal Data when performing your job duties requires it. You cannot Process Personal Data for any reason unrelated to your job duties.

8.3. You may only collect Personal Data that you require for your job duties: do not collect excessive data. Ensure any Personal Data collected is adequate and relevant for the intended purposes.

8.4. You must ensure that when Personal Data is no longer needed for specified purposes, it is deleted or anonymised in accordance with the Company's data retention guidelines.

9. Accuracy

9.1. Personal Data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.

9.2. You will ensure that the Personal Data we use, and hold is accurate, complete, kept up to date and relevant to the purpose for which we collected it. You must check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. You must take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.


9.3. The Company will maintain retention policies and procedures to ensure Personal Data is deleted after a reasonable time for the purposes for which it was being held, unless a law requires such data to be kept for a minimum time.

9.4. You will take all reasonable steps to destroy or erase from our systems all Personal Data that we no longer require in accordance with all the Company's applicable records retention schedules and policies. This includes requiring third parties to delete such data where applicable.

10. Security Integrity and Confidentiality

10.1. Protecting Personal Data. Personal Data must be secured by appropriate technical and organisational measures against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

10.1.1 Unless we can rely on another legal basis of Processing, Explicit Consent is usually required for Processing Sensitive Personal Data, and for cross border data transfers.

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Usually we will be relying on another legal basis (and not require Explicit Consent) to Process most types of Sensitive Data. Where Explicit Consent is required, you must issue a Fair Processing Notice to the Data Subject to capture Explicit Consent.

10.1.2 We will develop, implement and maintain safeguards appropriate to our size, scope and business, our available resources, the amount of Personal Data that we own or maintain on behalf of others and identified risks (including use of encryption and pseudonymisation where applicable). We will regularly evaluate and test the effectiveness of those safeguards to ensure security of our Processing of Personal Data. You are responsible for protecting the Personal Data we hold. You must implement reasonable and appropriate security measures against unlawful or unauthorised Processing of Personal Data and against the accidental loss of, or damage to, Personal Data. You must exercise particular care in protecting Sensitive Personal Data from loss and unauthorised access, use or disclosure.

10.1.3 You must follow all procedures and technologies we put in place to maintain the security of all Personal Data from the point of collection to the point of destruction. You may only transfer Personal Data to third-party service providers who agree to comply with the required policies and procedures and who agree to put adequate measures in place, as requested.

10.1.4 You must maintain data security by protecting the confidentiality, integrity and availability of the Personal Data, defined as follows:

- (a) Confidentiality means that only people who have a need to know and are authorised to use the Personal Data can access it.
- (b) Integrity means that Personal Data is accurate and suitable for the purpose for which it is processed.
- (c) Availability means that authorised users are able to access the Personal Data when they need it for authorised purposes.


10.2. Reporting a Personal Data Breach. The GDPR requires Data Controllers to notify any Personal Data Breach to the applicable regulatory and, in certain instances, the Data Subject.



According to the General Data Protection Regulation, a personal data breach is 'a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed' (Article 4, definition 12).

10.2.1 We have put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where we are legally required to do so.

10.2.2 If you know or suspect that a Personal Data Breach has occurred, do not attempt to investigate the matter yourself. Immediately contact the person or team designated in our Data Breach Notification Policy. You should preserve all evidence relating to the potential Personal Data Breach.

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11. Transfer Limitation



The EU General Data Protection Regulation (GDPR) restricts transfers of personal data to countries outside the EEA. These restrictions apply to all transfers, no matter the size of transfer or how often you carry them out.

11.1. The GDPR restricts data transfers to countries outside the EEA in order to ensure that the level of data protection afforded to individuals by the GDPR is not undermined. You transfer Personal Data originating in one country across borders when you transmit, send, view or access that data in or to a different country.

11.2. We may only transfer Personal Data outside the EEA if one of the following conditions applies:

- (a) the European Commission has issued a decision confirming that the country to which we transfer the Personal Data ensures an adequate level of protection for the Data Subjects' rights and freedoms.
- (b) appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved by the European Commission, an approved code of conduct or a certification mechanism, a copy of which can be obtained from the Privacy Officer.
- (c) the Data Subject has provided Explicit Consent to the proposed transfer after being informed of any potential risks; or
- (d) the transfer is necessary for one of the other reasons set out in the GDPR including the performance of a contract between us and the Data Subject, reasons of public interest, to establish, exercise or defend legal claims or to protect the vital interests of the Data Subject where the Data Subject is physically or legally incapable of giving Consent and, in some limited cases, for our legitimate interest.


12. Data Subject's Rights and Requests



Under the GDPR, data subjects have the right of access to personal data. confirmation of whether you are processing their data. other supplementary information (including mandatory privacy information) a copy of the personal data being processed.

12.1. Data Subjects have rights when it comes to how we handle their Personal Data. These include rights to:

- (a) withdraw Consent to Processing at any time.
- (b) receive certain information about the Data Controller's Processing activities.
- (c) request access to their Personal Data that we hold.
- (d) prevent our use of their Personal Data for direct marketing purposes.

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- (e) ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or Processed or to rectify inaccurate data or to complete incomplete data.
- (f) restrict Processing in specific circumstances.
- (g) challenge Processing which has been justified on the basis of our legitimate interests or in the public interest.
- (h) request a copy of an agreement under which Personal Data is transferred outside of the EEA.
- (i) prevent Processing that is likely to cause damage or distress to the Data Subject or anyone else.
- (j) be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedoms.
- (k) make a complaint to the supervisory authority; and
- (l) in limited circumstances, receive or ask for their Personal Data to be transferred to a third party in a structured, commonly used and machine-readable format.

12.2. You must verify the identity of an individual requesting data under any of the rights listed above (do not allow third parties to persuade you into disclosing Personal Data without proper authorisation).


12.3. You must immediately forward any Data Subject request you receive to the Privacy officer and comply with the company's Data Subject response process.

13. Accountability

13.1. The Data Controller must implement appropriate technical and organisational measures in an effective manner, to ensure compliance with data protection principles. The Data Controller is responsible for, and must be able to demonstrate, compliance with the data protection principles.

13.2. The Company must have adequate resources and controls in place to ensure and to document GDPR compliance including:

- (a) appointing an executive accountable for data privacy.
- (b) implementing Privacy by Design when Processing Personal Data and completing DPIAs where Processing presents a high risk to rights and freedoms of Data Subjects.
- (c) integrating data protection into internal documents including this Privacy Standard, Related Policies, Privacy Notices or Fair Processing Notices.
- (d) regularly training Company Personnel on the GDPR, this Privacy Standard, Related Policies and data protection matters including, for example, Data Subject's rights, Consent, legal basis, DPIA and Personal Data Breaches. The Company must maintain a record of training attendance by Company Personnel; and
- (e) regularly testing the privacy measures implemented and conducting periodic reviews and audits to assess compliance, including using results of testing to demonstrate compliance improvement effort.

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14. Record Keeping

14.1. The GDPR requires us to keep full and accurate records of all our data processing activities.

14.2. We must keep and maintain accurate corporate records reflecting our Processing including records of Data Subjects' Consents and procedures for obtaining Consents.

14.3. These records should include, at a minimum, the name and contact details of the Data Controller and the Privacy Officer, clear descriptions of the Personal Data types, Data Subject types, Processing activities, Processing purposes, third-party recipients of the Personal Data, Personal Data storage locations, Personal Data transfers, the Personal Data's retention period and a description of the security measures in place. In order to create such records, data maps should be created which should include the detail set out above together with appropriate data flows.

15. Training and Audit

15.1. We are required to ensure all Company Personnel have undergone adequate training to enable them to comply with data privacy laws. We must also regularly test our systems and processes to assess compliance.

15.2. You must undergo all mandatory data privacy related training.

15.3. We will regularly review all the systems and processes under our control to ensure they comply with this Privacy Standard and check that adequate governance controls and resources are in place to ensure proper use and protection of Personal Data.

16. Privacy by Design & Data Protection Impact Assessment

16.1. We are required to implement Privacy by Design measures when Processing Personal Data by implementing appropriate technical and organisational measures (like Pseudonymisation) in an effective manner, to ensure compliance with data privacy principles.


16.2. We must assess what Privacy by Design measures can be implemented on all programs/systems/processes that Process Personal Data by taking into account the following:

- (a) the state of the art.
- (b) the cost of implementation.
- (c) the nature, scope, context and purposes of Processing; and
- (d) the risks of varying likelihood and severity for rights and freedoms of Data Subjects posed by the Processing.

16.3. Data controllers must also conduct DPIAs in respect to high risk Processing.

16.4. We will need to conduct a Design and Data Protection Impact Assessment (DPIA) when implementing major system or business change programs involving the Processing of Personal Data including:

- (a) use of new technologies (programs, systems or processes), or changing technologies (programs, systems or processes).
- (b) large scale Processing of Sensitive Data; and
- (c) large scale, systematic monitoring of a publicly accessible area.

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16.5. A DPIA must include:

- (a) a description of the Processing, its purposes and the Data Controller's legitimate interests if appropriate.
- (b) an assessment of the necessity and proportionality of the Processing in relation to its purpose.
- (c) an assessment of the risk to individuals; and
- (d) the risk mitigation measures in place and demonstration of compliance.

17. Direct Marketing

17.1. We are subject to certain rules and privacy laws when marketing to our customers.

17.2. For example, a Data Subject's prior consent is required for electronic direct marketing (for example, by email, text or automated calls). The limited exception for existing customers known as "soft opt in" allows organisations to send marketing texts or emails if they have obtained contact details in the course of a sale to that person, they are marketing similar products or services, and they gave the person an opportunity to opt out of marketing when first collecting the details and in every subsequent message.

17.3. The right to object to direct marketing must be explicitly offered to the Data Subject in an intelligible manner so that it is clearly distinguishable from other information.

17.4. A Data Subject's objection to direct marketing must be promptly honoured. If a customer opts out at any time, their details should be suppressed as soon as possible. Suppression involves retaining just enough information to ensure that marketing preferences are respected in the future.


18. Sharing Personal Data

18.1. Generally, we are not allowed to share Personal Data with third parties unless certain safeguards and contractual arrangements have been put in place.

18.2. You may only share the Personal Data we hold with another employee or agent if the recipient has a job-related need to know the information and the transfer complies with any applicable cross-border transfer restrictions.

18.3. You may only share the Personal Data we hold with third parties, such as our service providers if:

- (a) they have a need to know the information for the purposes of providing the contracted services.
- (b) sharing the Personal Data complies with the Privacy Notice provided to the Data Subject and, if required, the Data Subject's Consent has been obtained.
- (c) the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place.
- (d) the transfer complies with any applicable cross border transfer restrictions; and
- (e) a fully executed written contract that contains GDPR approved third party clauses has been obtained.

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19. Changes to this Standard

19.1. We reserve the right to change this Privacy Standard at any time without notice to you so please check back regularly to obtain the latest copy of this Privacy Standard. We will revise this Privacy Standard within one year of this revision.

19.2. This Privacy Standard does not override any applicable national data privacy laws and regulations in countries where the Company operates.

This policy has been approved and authorised on behalf of Delta Matrix Limited by:



Marcel Madden BEng (Hons), CEng, DMS, MIET
Managing Director


20. Acknowledgement of Receipt and Review

Iacknowledge that on I received and read a copy of Delta Matrix Limited’s Privacy Standard, latest revision as dated in the amendment history, and understand that I am responsible for knowing and abiding by its terms. This Privacy Standard does not set terms or conditions of employment or form part of an employment contract.

Signed.....

Print Name.....

Date.....

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