

DATA PROTECTION POLICY

1. Introduction

This policy sets out RA's commitment to ensuring that any personal data, which RA processes and related to the Data Subject, whether its RA employee, RA client or RA supplier, is carried out in line with International best practice. RA is committed to ensuring that all the personal data that it processes is done in a fair and transparent manner. RA ensures that good data protection practice is imbedded in the culture of our staff and our organisation.

2. Scope

This policy applies to all personal data processed by RA, which all RA employees are expected to comply with this policy. Failure to comply could lead to disciplinary action for misconduct, up to and including dismissal.

2.1 What personal data and activities are covered under this policy

This policy covers data:

- 2.1.1 Which relates to a natural living individual who can be identified whether from that information in isolation or by reading it together with other information possessed by RA;
- 2.1.2 Which is stored electronically or on paper in a filing system;
- 2.1.3 Which is in the form of statement or opinion as well as facts;
- 2.1.4 Which relates to RA staff or to any other individual whose personal data is handled or controlled by RA including but not limited to RA clients and suppliers (the "Data Subject").
- 2.1.5 Which is obtained or provided to RA, which RA hold or store, organise, disclose or transfer, retrieve, use, handle, process, transport or destroy.

3. Data Protection Principles

RA complies with the data protection principles set out below. When processing personal data, it ensures that:

- 3.1 it is processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
- 3.2 it is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation')
- 3.3 it is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
- 3.4 it is all accurate and, where necessary, kept up to date and that reasonable steps will 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 ('accuracy')
- 3.5 it is 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 ('storage limitation')

- 3.6 it is 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 organisational measures ('integrity and confidentiality')

4. Type of Personal data collected, stored and used include records related to:

- 4.1 home or work address, contact details for the Data Subject such as telephone, email and contact details for the Data Subject next of kin;
- 4.2 recruitment (including curriculum vitae, application and reference);
- 4.3 pay records, national insurance number and details of tax and any employment benefits, such as pension and health insurance related to the Data Subject;
- 4.4 performance or any disciplinary matter, grievances, complaints in which the Data Subject was involved;
- 4.5 any information related to the Data Subject racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, medical information, sex life or sexual orientation and biometric data.

5. Process and Procedure

RA will process personal data only if:

- 5.1 its for a lawful basis, e.g. process an employment contract for an employee;
- 5.2 the Data Subject has given its explicit consent;
- 5.3 the processing is necessary for the purposes of exercising the employment law rights and obligations of RA or the Data Subject;
- 5.4 the processing is necessary to protect the Data Subject's vital interests, and the Data Subject is physically incapable of giving consent;
- 5.5 the processing relates to personal data which are manifestly made public by the Data Subject;
- 5.6 the processing is necessary for the establishment, exercise or defence or legal claims;
- 5.7 the processing is necessary for reasons of substantial interests.

RA will:

- 5.8 not process the data unless the assessment above has taken place, and the Data Subject has been properly informed of the nature of the processing.
- 5.9 not process the data except as directed in this policy.
- 5.10 only collect and process the personal data that it needs for purposes it has identified in advance.
- 5.11 ensure that, as far as possible, the personal data it holds is accurate, or a system is in place for ensuring that it is kept up to date as far as possible.

5.12 only hold onto the personal data for as long as it is needed, after which time RA will securely erase or delete the personal data.

5.13 ensure that appropriate security measures are in place to ensure that personal data can only be accessed by those who need to access it and that it is held and transferred securely.

RA will ensure that all staff who handle personal data on its behalf are aware of their responsibilities under this policy and other relevant data protection and information security policies. Breaching this policy may result in disciplinary action for misconduct, up to and including dismissal.

Any RA employee who wishes to access any of their personal data held by the company, should submit a written request to the Head of Human Resources, stating the reason for this request. Employees are requested, upon receipt of such data, to check its accuracy and inform the company of any amendments which need to be made.

A handwritten signature in blue ink, appearing to read 'Soraya Narfeldt', written over a horizontal line.

Soraya Narfeldt

CEO

Policy Implementation/ Review Date	Next Policy Review Date
January-2026	January-2027