

# TUTELA GROUP

## POLICY DOCUMENT

GDPR  
POLICY



# GDPR Policy

At The Tutela Group, we are committed to protecting the privacy and personal data of our employees, clients, partners, and all stakeholders. As a company providing construction, fit out, refurbishment, facilities maintenance, and special projects services, we ensure that all our data processing activities comply with the General Data Protection Regulation (GDPR) and other applicable data protection laws. This policy outlines our approach to handling personal data, safeguarding privacy, and maintaining transparency in our data practices.

## GDPR Policy Statement

*“The Tutela Group is dedicated to upholding the highest standards of data protection and privacy. We commit to processing personal data lawfully, fairly, and transparently, ensuring the security and integrity of all personal information entrusted to us. Our practices are designed to respect individual rights and to foster trust with all stakeholders while achieving our business objectives.”*

## Policy Objectives

- **Compliance:** Ensure all data processing activities comply with GDPR and relevant local data protection regulations.
- **Transparency:** Provide clear, accessible information about how personal data is collected, used, stored, and shared.

- **Data Security:** Implement robust security measures to protect personal data from unauthorized access, loss, or disclosure.
- **Respect for Data Subject Rights:** Uphold the rights of individuals regarding their personal data, including access, correction, deletion, and objection rights.
- **Continuous Improvement:** Regularly review and enhance our data protection practices to address emerging risks and evolving regulatory requirements.

## Scope

This policy applies to all personal data processed by The Tutela Group in the course of our business activities, whether collected from employees, clients, contractors, suppliers, or any other stakeholders. It covers data collected through all means, including electronic, paper-based, and verbal communications.

## Key Principles of Data Protection

### Lawfulness, Fairness, and Transparency:

Personal data is processed only for legitimate purposes, in a manner that is fair and transparent to the data subject.

We provide clear privacy notices that inform individuals about our data processing practices.

### Purpose Limitation:

Data is collected for specified, explicit, and legitimate purposes and not further processed in a

manner incompatible with those purposes.

#### **Data Minimization:**

We ensure that only the personal data necessary for the intended purpose is collected and processed.

#### **Accuracy:**

We take reasonable steps to ensure personal data is accurate, complete, and up-to-date, and provide mechanisms for data correction where necessary.

#### **Storage Limitation:**

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by law.

#### **Integrity and Confidentiality:**

Appropriate technical and organizational measures are in place to protect personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage.

### **Data Processing and Lawful Basis**

#### **Consent and Contractual Necessity:**

Where applicable, personal data is processed on the basis of the individual's consent or as necessary for the performance of a contract.

#### **Legal Obligations and Legitimate Interests:**

In other cases, data processing may be necessary to comply with legal obligations or for the legitimate interests of The Tutela Group, provided these interests do not override the fundamental rights of the data subjects.

### **Data Subject Rights**

The Tutela Group recognizes the following rights of data subjects under GDPR:

- **Right to Access:** Individuals can request access to their personal data.
- **Right to Rectification:** Individuals can request corrections to inaccurate or incomplete data.
- **Right to Erasure:** Under certain conditions, individuals can request the deletion of their personal data.
- **Right to Restriction of Processing:** Data subjects may request the limitation of processing where applicable.
- **Right to Data Portability:** Individuals have the right to receive their data in a structured, commonly used, and machine-readable format.
- **Right to Object:** Individuals may object to the processing of their personal data on grounds relating to their particular situation.
- **Right to Withdraw Consent:** Where processing is based on consent, data subjects can withdraw consent at any time.

Requests to exercise these rights

should be directed to the designated Data Protection Officer (DPO) at The Tutela Group.

## Roles and Responsibilities

### Senior Management:

- Ensure that adequate resources are allocated to implement and maintain this GDPR policy.
- Oversee data protection strategies and ensure compliance across all levels of the organization.

### Data Protection Officer (DPO):

- Monitor compliance with GDPR and this policy.
- Act as the point of contact for data subjects and regulatory authorities.
- Provide guidance and training on data protection matters.

### All Employees and Contractors:

- Adhere to the guidelines and procedures outlined in this policy.
- Attend training sessions on data protection.
- Report any data protection breaches or concerns to the DPO promptly.

## Data Security Measures

### Access Controls:

Implement strict access controls to ensure that personal data is

only accessible to authorized personnel.

### Data Encryption and Secure Storage:

Use encryption and secure storage solutions to protect personal data during transmission and at rest.

### Regular Security Audits:

Conduct regular audits and risk assessments to identify vulnerabilities and enhance data security measures.

### Incident Response:

Maintain an incident response plan to address any data breaches swiftly and effectively, in accordance with GDPR breach notification requirements.

## Data Retention and Disposal

### Retention Policy:

Personal data is retained only for the duration necessary to meet the specified purposes, unless a longer period is required by law.

### Secure Disposal:

Once personal data is no longer needed, it is securely disposed of using methods that prevent unauthorized access or reconstruction.

## Training, Awareness, and Monitoring

### Regular Training:

Provide ongoing training

and awareness programs for employees and contractors on GDPR and data protection best practices.

**Monitoring and Auditing:**

Continuously monitor our data processing activities and conduct periodic audits to ensure compliance with this policy and GDPR requirements.

**Review and Improvement:**

This policy will be reviewed regularly and updated as necessary to reflect changes in regulatory requirements or our business practices.

By implementing this GDPR Policy, The Tutela Group reinforces its commitment to protecting personal data, respecting individual privacy rights, and maintaining the trust of our stakeholders. All employees, contractors, and partners are expected to adhere to the principles and practices outlined in this policy to ensure that our data protection standards remain exemplary and compliant with all relevant laws and regulations.

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Issued By: Robert Taylor

Position: Managing Director

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