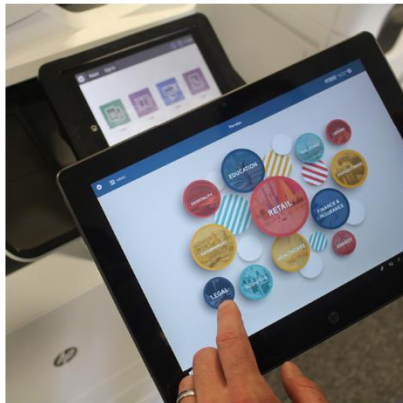


Data Protection Policy



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Content

GENERAL	2
POLICY OWNER	2
POLICY REVIEW	2
APPLICABILITY	2
TERMS, ABBREVIATIONS AND VOCABULARY	2-3
POLICY	3-4
POLICY STANDARD(S)	4
RESPONSIBILITIES	4
DATA PROTECTION LEAD	5
DIRECTORS/MANAGERS/SUPERVISORS	5
EMPLOYEES.....	5
FURTHER INFORMATION	6
ENFORCEMENT	6
POLICY APPROVAL	6
APPOINTMENT AND ACCEPTANCE OF SPECIFIC RESPONSIBILITIES	6

General

The General Data Protection Regulations controls how organisations, businesses or the government uses personal information. Everyone responsible for using data has to follow strict rules called ‘data protection principles’. They must make sure the information is: used fairly and lawfully, used for limited, specifically stated purposes, used in a way that is adequate, relevant and not excessive, accurate, kept for no longer than is absolutely necessary, handled according to the “Rights of the data subject”, kept secure and not transferred outside the UK without adequate protection.

There is stronger legal protection for sensitive personal data, such as ethnic background, political opinions, religious beliefs, health, sexual health, criminal records

Policy Owner

The Group IT Director owns this policy.

Policy Review

This policy will be subject to periodic review under the governance of the policy for Document Control and the authority of the Compliance Council

Applicability

This policy shall be accepted as the principal policy for implementation and guidance regarding the application of the Regulation (EU) 2016/679 (General Data Protection Regulation) across Apogee. The requirements and responsibilities stated by this policy apply to employees, contractors, consultants, temporary, and other workers at Apogee, including all personnel affiliated with third parties, who by their employment or engagement may access or process data on behalf of Apogee.

Terms, Abbreviations and Vocabulary

“will” “must” “shall”	Indicates a mandated requirement
“should”	Indicates a recommendation
“may”	Indicates a permission
“can”	Indicates a possibility or a capability
“Apogee” “the company”	Apogee Corporation Limited
“ Personal Data”	‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

“ Sensitive Personal Data”	Any information relating to an individual’s: (a) Ethnicity (b) Gender (c) Religious or other beliefs (d) Political opinions (e) Membership of a trade union (f) Sexual orientation (g) Medical history (h) Offences committed or alleged to have been committed by that Individual.
“data subject”	Any individual who is the subject of personal data whether in a personal or business capacity
“Processing” ‘	Processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
“GDPR” “The Regulation” “Data Controller” “Data Protection Lead”	Regulation (EU) 2016/679 (General Data Protection Regulation)
“Applicable supervisory authority”	The Information Commissionaire’s Office (ICO)

Policy

Policy In order to operate its daily business and for the organisation to operate effectively Apogee needs to collect and process personal data about people, including staff, organisations and individuals with whom it deals with. In doing so; personal information will be treated fairly, lawfully, correctly and in compliance with the Regulation (EU) 2016/679 (General Data Protection Regulation). In attaining this, the company will maintain the security and confidentiality of information, information systems, applications and networks owned or held by Apogee.

Policy Standard(s) Data Processing The adapted processes and systems of work shall ensure that personal data is:

- i. processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
- ii. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- iii. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);
- iv. accurate and, where necessary, kept up to date; every reasonable step must 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’);

- v. 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;
- vi. 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').

Rights of the Data Subject

The adapted processes and systems of work shall ensure that Data Subjects are provided with:

- i. information regarding the collection and further processing of their personal data, such information shall be provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language.
- ii. the right to file a request ("SAR") and obtain from Apogee a copy of their personal data, together with an explanation of the categories of data being processed, the purposes of such processing, and the categories of third parties to whom the data may be disclosed.
- iii. the right to require errors in personal data processed by (or on behalf of) that Apogee to be corrected.
- iv. the right to require Apogee to delete their personal data where their data is no longer needed for their original purpose, or where the processing is based on the consent and the data subject withdraws that consent (and no other lawful basis for the processing exists).
- v. the right to obtain from Apogee, the restriction of processing where conditions of Article 18 of the regulations are met.
- vi. copies of his or her personal data in a commonly used machine-readable format, and to transfer their personal data from one data controller to another or have the data transmitted directly between data controllers.
- vii. the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1) of the regulation, including profiling based on those provisions.
- viii. the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

Responsibilities

Data Protection Lead

The appointed Data Protection Lead shall discharge their responsibilities for the protection and management of data by:

- i. Ensuring that Apogee has and can identify a lawful basis for all processing of personal data;
 - a. where consent is the basis for processing, implement policy, process or technical controls to review existing mechanisms for obtaining consent, with the objective of ensuring that the provision of consent meets the requirements of the regulation;
 - b. where a legitimate interest is the basis for processing, maintain records of an assessment of that legitimate interest, to show that Apogee has properly considered the rights of data subjects;

- ii. Implementing policy, process or technical controls to:
 - a. Ensure that all data processing is in accordance the principals of the regulation and this policy;
 - b. ensure that appropriate controls are placed upon the processing of what are termed special or sensitive categories of personal data;
 - c. ensure that any engagement with a data processor is governed by a written contract, including details of the processing, the processor's obligations, the standards the processor must meet when processing personal data and the permissions it needs from Apogee in relation to the processing.
 - d. monitor and assess new processing of personal data and to ensure the applicable supervisory authority is updated to take account of any changes in processing of personal data;
 - e. identify, report, and resolve to a root cause any unauthorised or unlawful processing, accidental loss, destruction or damage of personal data; f. effectively implement the rights of the data subject.
- iii. Ensuring that registration is maintained with applicable supervisory authority
- iv. Making training available for all staff members who handle personal information and ensure access to further guidance and support.
- v. Providing clear lines of report and supervision for compliance with this policy.

Directors / Managers / Supervisors

Directors / Managers / Supervisors shall discharge their responsibilities for the protection and management of data processing by:

- i. Ensuring training is provided for all direct reports who handle personal information and ensure access to further guidance and support;
- ii. providing clear lines of report and supervision for compliance with this policy;
- iii. consulting with the Data Protection Lead before entering into any new, or revising any data processing activity that includes the processing of personal data. iv. On receipt of a request by or on behalf of an individual for information held about them will immediately notify the Data Protection Lead.

Employees

All employees will, through appropriate training and responsible management discharge their responsibilities for the protection and management of data processing by:

- i. Observing and practicing all forms of guidance, codes of practice and procedures about the collection and use of personal information.
- ii. Understanding fully the purposes for which Apogee uses personal information.
- iii. Collect and process appropriate information, and only in accordance with the purposes for which it is collected by Apogee to meet its service needs or legal requirements.
- iv. Ensure the information is destroyed (in accordance with the provisions of the Regulation) when it is no longer required. v. On receipt of a request by or on behalf of an individual for information held about them will immediately notify their line manager.

Further Information

Further information regarding Data Protection shall be published in support of this policy within the “Employee Handbook”.

Enforcement

The following behaviour by an employee may constitute as gross misconduct and may result in disciplinary action up to and including dismissal without notice: Any activity that opens Apogee or themselves to any increased or unidentified risk within the scope of this policy or that conflict with the intent of this policy or the interests of Apogee; and knowingly circumventing or breaching the aims, practices and controls of this policy.

Policy Approval

This document defines the approach to compliance with the Regulation (EU) 2016/679 (General Data Protection Regulation), including all variations as amended from time to time; as developed by Apogee Corporation Limited and shall be accepted as the principal policy regarding Data Protection across business requirements as stated.

Signed



Simon Green
Group IT Director
Apogee Corporation Limited

Effective: 06th January 2020

Appointment and Acceptance of Specific Responsibilities. The below stated Person(s) are appointed specific responsibilities as Data Protection Lead for Apogee Corporation Limited. The named persons below accept the duties as Data Protection Lead, consisting of such duties and responsibilities that are consistent with their position of employment, including but not be limited to, the responsibilities specified by this policy.

Signed



Robert Marr
Head of Legal
Apogee Corporation Limited

Effective: 06th January 2020