

## DATA PROTECTION POLICY

### 1. AIM & SCOPE OF POLICY

The Board has set out the following policy in respect of meeting the legislation requirements regarding Data Protection. This policy statement is reviewed on a regular basis and available on the company's Sharepoint system.

The Company makes a commitment to ensuring that personal data, including special categories of personal data and criminal offence data (where appropriate) is processed in line with General Data Protection Regulation (GDPR) and domestic laws and all its employees conduct themselves in line with this.

Where third parties process data on behalf of the Company, the Company will seek assurance from the third party that they take such measures in order to maintain the Company's commitment to protecting data. In line with GDPR, the Company understands that it will be accountable for the processing, management and regulation, and storage and retention of all personal data held in the form of manual and electronic records.

### 2. DATA PROECTION PRINCIPLES

All personal data obtained and held by the Company will:

- be processed fairly, lawfully and in a transparent manner.
- be collected for specific, explicit, and legitimate purposes.

- be adequate, relevant and limited to what is necessary for the purposes of processing.
- be kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay.
- not be kept for longer than is necessary for its given purpose.
- be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage by using appropriate technical or organisation measures.
- comply with the relevant GDPR procedures for international transferring of personal data.

In addition, personal data will be processed in recognition of an individuals' data protection rights, as follows:

- the right to be informed.
- the right of access.
- the right for any inaccuracies to be corrected (rectification).
- the right to have information deleted (erasure).
- the right to restrict the processing of the data.
- the right to portability.
- the right to object to the inclusion of any information.
- the right to regulate any automated decision-making and profiling of personal data.

### 3. POLICY STATEMENT

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The Company has taken the following steps to protect the data of data subject, which it holds or to which it has access:

- it appoints personnel with specific responsibilities for:
  - a) the processing and controlling of data
  - b) the reviewing and auditing of its data protection systems and procedures

There are clear lines of responsibility and accountability for these different roles.

- it defines what personal data is and publishes privacy notices.
- it provides information to its employees on their data protection rights, how it uses their personal data, and how it protects it.
- it provides its employees with information and training to make them aware of the importance of protecting personal data, to teach them how to do this, and to understand how to treat information confidentially.
- it can account for all personal data it holds, where it comes from, who it is shared with and who it might be shared with.
- it carries out risk assessments as part of its reviewing activities to identify any vulnerabilities in its personal data handling and processing, and to take measures to reduce the risks of mishandling and potential breaches of data security. The procedure includes an assessment of the impact of both use and potential misuse of personal data in and by the Company.
- it recognises the importance of seeking individuals' consent for obtaining, recording, using, sharing, storing and retaining their personal data, and regularly reviews its procedures for doing so, including the audit trails that are needed and are followed for all consent decisions.

- it has the appropriate mechanisms for detecting, reporting, and investigating suspected or actual personal data breaches, including security breaches. It is aware of its duty to report significant breaches that cause significant harm to the affected individuals to the Information Commissioner and is aware of the possible consequences.
- the requirements of the GDPR are incorporated in the company's integrated quality environmental management system procedures.

### 4. ACCESS TO DATA

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Relevant individuals have a right to be informed whether the Company processes personal data relating to them and to access the data that the Company holds about them.

### 5. TRAINING & COMMUNICATION

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New employees must read and understand the policies on data protection as part of their induction.

All employees are informed of basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

### 6. DATA PROTECTION COMPLIANCE

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The Managing Director is the Company's appointed officer in respect of its data protection activities.

Managing Directors details:

Name: Graham Edge

Email: [graham.edge@k-lab.se](mailto:graham.edge@k-lab.se)

I hereby give the company's commitment to this policy.

Graham Edge | Verkställande Direktör

K-Lab Projektering AB

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