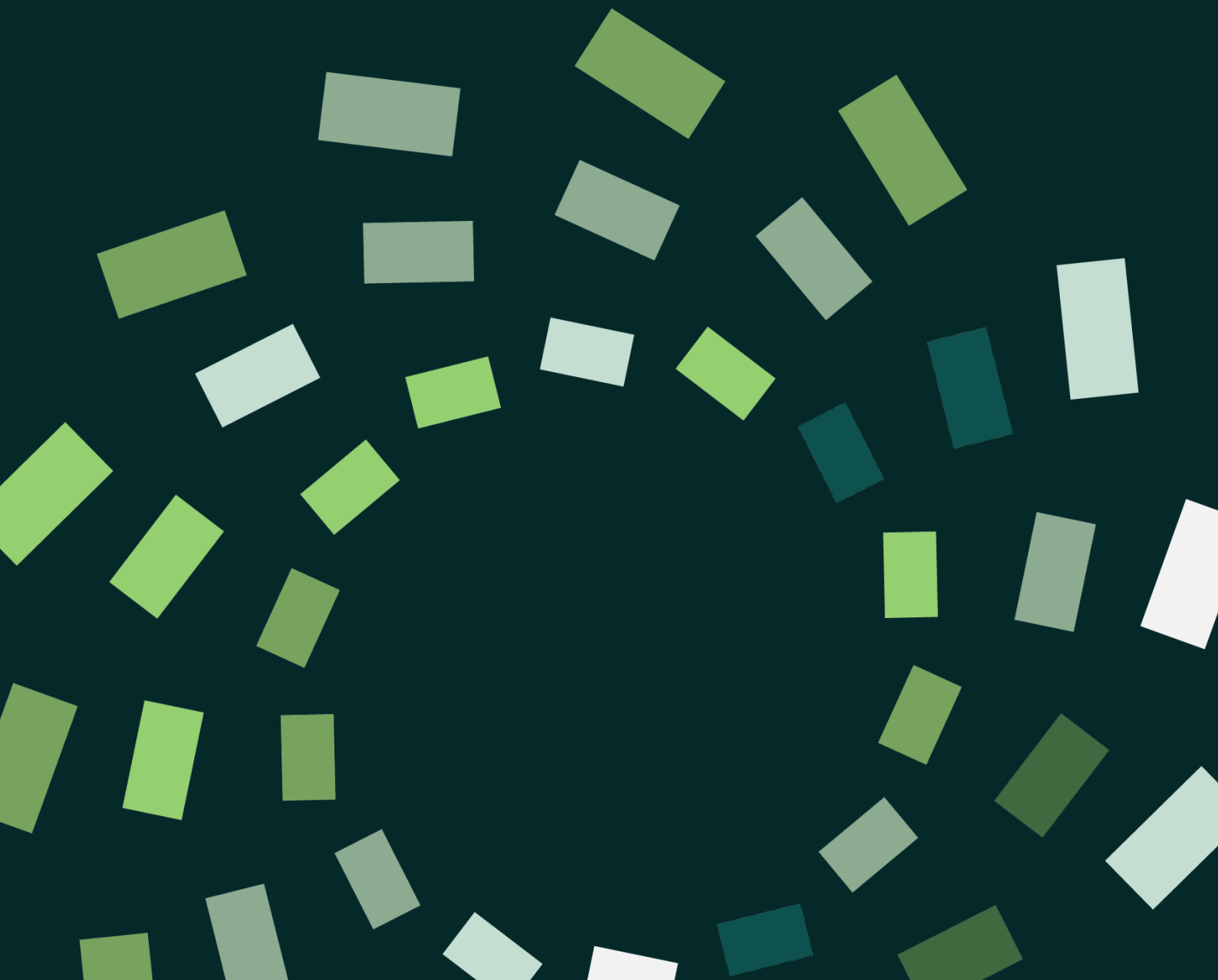
Green Guarantee Company

A greener world guaranteed

Data protection policy



Contents

Data protection policy

1. Purpose

1.1 This Policy sets out the obligations of Green Guarantee Company Ltd. (GGC or the Company) under UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. GGC is managed by the Development Guarantee Group Ltd. (DGG or the Manager).

1.2 The GDPR defines "personal data" as any information relating to an identified or identifiable natural person (a "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.

1.3 GGC is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2. Scope

2.1 This Policy applies to all staff and officers of GGC and to other person involved in providing a service to GGC (including outsourced services) to the extent required by GGC.

2.2 This Policy does not form part of any employee's contract of employment and GGC may amend it at any time.

3. Introduction

3.1 GGC is committed to a policy of protecting the rights and privacy of customers and staff in accordance with the GDPR.

3.2 The dedicated Data Protection Officer (DPO) for GGC is the CEO of the Manager.

4. Data protection principles

4.1 In terms of the GDPR, GGC is the 'data controller' and as such determines the purpose for which, and the manner in which, any personal data is, or will be, processed. GGC will ensure that it will:

- Fairly and lawfully process personal data and will always put its logo on all paperwork, stating the intentions of processing the data and state if, and to whom, it intends to give the personal data.
- Process the data for limited purpose. GGC will not use data for a purpose other than those agreed by data subjects. If the data held by GGC is requested by external organisations for any reason, this will only be passed if data subjects agree. In addition to this, external organisations must state the purpose of processing.
- Hold adequate, relevant and not excessive data. GGC will monitor the data held for its purposes, ensuring it holds neither too much nor too little data in respect of the individuals about whom the data is held. If data given or obtained is excessive for such purpose, it will be immediately deleted or destroyed.
- Hold accurate and up-to-date data. It is the responsibility of individuals and organisations to ensure the data held by GGC is accurate and up to date. Verbal confirmation will be taken as an indication that the data contained is accurate. Individuals should notify GGC of any changes, to enable personnel records to be updated accordingly. It is the responsibility of GGC to act upon notification of changes to data, amending them where relevant.
- Data is not kept longer than necessary. GGC discourages the retention of data for longer than it is required.
- Data is processed in accordance with the individual's rights. All individuals that GGC hold data on have the right to:
    - Be informed upon the request of all the information held about them within 40 days.
    - Prevent the processing of their data for the purpose of direct marketing.
    - The removal and correction of any inaccurate data about them.
- Keep all data secure. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data. All computers used by the Manager to process GGC data have a log in system which allow only authorised staff to access personal data. Passwords on all computers used by the Manager are changed frequently. Any hard copies of personal and financial data relating to GGC will be kept in a locked filing cabinet and will only be accessible by authorised DGG personnel.

5. Data breaches

5.1 Any suspected personal data breaches will be investigated immediately. Where required, the Company will report the breach to the Information Commissioner's Office (ICO) within 72 hours and inform affected data subjects where appropriate.

6. Data sharing and transfers

6.1 The Company may share personal data with third parties where required by law or for operational purposes, under strict contractual and confidentiality obligations. Personal data will not be transferred outside the UK unless adequate protections are in place.

7. Responsibilities

7.1 The Board of GGC is responsible for ensuring personal data is processed in accordance with this policy and the DPO oversees compliance with this policy and relevant legislation.

8. Training and awareness

8.1 GGC Board and the Manager will receive regular data protection training as required.