

## Data Protection Policy

SGE is committed to processing data in accordance with its responsibilities under the GDPR, and this policy applies to all personal data held. As SGE has solely business customers, the only personal information held is past and present employees.

SGE will ensure that:

- Individuals have the right to access their personal data and any such requests shall be dealt with in a timely manner.
- All data processed by SGE must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests - where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- All personal data held is adequate, relevant and limited to what is necessary in relation to the purposes for which they were requested.
- All reasonable steps are taken to ensure personal data is accurate and up-to-date.
- Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- When employees leave, all data which is no longer required for legal reasons will be destroyed in such a way as to be irrecoverable.
- All data kept for legal reasons will be destroyed after 7 years.
- Appropriate back-up and disaster recovery solutions are in place.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, SGE shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Signed:



William Silverstone (Managing Director)