

Data Protection Policy

1 Purpose and Scope

This policy provides a framework for ensuring that UK Diveworks Commercial Ltd (UKDC) meets its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 18). It applies to all the processing of personal data carried out by UKDC.

UKDC complies with data protection legislation guided by the six data protection principles. In summary, they require that personal data is:

- processed fairly, lawfully and in a transparent manner.
- used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes.
- adequate, relevant, and limited to what is necessary.
- accurate and, where necessary, up to date.
- not kept for longer than necessary; and
- kept safe and secure.

In addition, the accountability principle requires us to be able to evidence our compliance with the above six principles and make sure that we do not put individuals at risk because of processing their personal data. Failure to do so, can result in breach of legislation, reputational damage, or financial implications due to fines. To meet our obligations, we put in place appropriate and effective measures to make sure we comply with data protection law. Our staff have access to a number of policies, operational procedures and guidance to give them appropriate direction on the application of the data protection legislation.

2 Information covered by Data Protection Legislation

The UK GDPR definition of "personal data" includes any information relating to an identified or identifiable natural living person.

Pseudonymized personal data is covered by the legislation, however anonymized data is not regulated by the UK GDPR or DPA 18, providing the anonymization has not been done in a reversible way.

Some personal data is more sensitive and is afforded more protection, this is information related to:

- Race or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric ID data;
- Health data;
- Sexual life and/or sexual orientation; and
- Criminal data (convictions and offences)

3 Our Commitment

UKDC is committed to transparent, lawful, and fair proportionate processing of personal data. This includes all personal data we process about customers, staff or those who work or interact with us.

- **Breaches** - we consider personal data breach incidents and have a reporting mechanism that is communicated to all staff.
- **Policies and Procedures** - we produce policies and guidance on information management and compliance that we communicate to staff.
- **Safeguarding** – Our online form, completed by sub-contractors will be maintained and protection by Microsoft 365 will be continually evaluated. We will maintain our front end database with additional security, ensuring your online signatures are secured and are unable to be changed or duplicated.

4 Review and signed

This Policy will be review annually to ensure that it continually aligns with UK Diveworks Commercial Ltd's core values.

Signed



Dan Walters
Managing Director

Date Signed: 14/12/2023

Review Date: 14/12/2024