

## DATA PROTECTION POLICY

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This Policy sets out the obligations of Greener Ealing Ltd (“the Company”) regarding data protection and the rights of employees, customers, potential customers, business contacts, and other individuals (“data subjects”) in respect of their personal data under Data Protection Law. “Data Protection Law” means all legislation and Regulations in force from time to time regulating the use of personal data and the privacy of electronic communications including, but not limited to, the retained EU law version of the General Data Protection Regulations ((EU) 2016/679) (the “UK GDPR” enacted into law by section 3 of the European Union (Withdrawal) Act 2018), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 as amended, and any successor legislation (“the Regulations”).

This Policy together with our GDPR User manual sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

### SECTION A – The Data Protection Principles

This section of the Policy sets out the Data Protection Principles contained within the Regulations, that the Company must comply with, when handling personal data.

#### 1. Lawful, Fair, and Transparent Data Processing

1.1 The Regulations seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulations states that processing of personal data shall be lawful if at least one of the following applies:

- a) the data subject has **given consent** to the processing of his or her personal data for one or more specific purposes;
- b) processing is **necessary for the performance of a contract** to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for **compliance with a legal obligation** to which the controller is subject;
- d) processing is **necessary to protect the vital interests of the data subject** or of another natural person;
- e) processing is **necessary for the performance of a task carried out in the public interest** or in the exercise of official authority vested in the controller;

- f) processing is **necessary for the purposes of the legitimate interests pursued by the controller or by a third party**, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

1.2 The Company shall ensure that it keeps under regular review and recorded, the different categories of data it holds and the lawful basis it uses for the processing of such data (for example, consent or performance of a contract etc).

## 2. Processed for Specified, Explicit and Legitimate Purposes

2.1 The Company collects and processes the personal data set out in Part 16 of this Policy. This may include personal data received directly from data subjects (for example, contact details used when a data subject communicates with us or submits through the website) and data received from third parties (for example, from Ealing Council or other partners);

2.2 The Company only processes personal data for the specific purposes set out in Part 16 of this Policy (or for other purposes expressly permitted by the Regulations). The purposes for which we process personal data will be informed to data subjects at the time that their personal data is collected, where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

## 3. Adequate, Relevant and Limited Data Processing

The Company will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under Part 2, above.

## 4. Accuracy of Data and Keeping Data Up To Date

The Company shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at regular intervals thereafter. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

## 5. Timely Processing

The Company shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay.

## 6. Secure Processing

The Company shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and

against accidental loss, destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in the Company's GDPR User Manual.

## SECTION B – Accountability and Assessments

### 7. Accountability

The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate appropriate information as detailed in the Company's GDPR User Manual.

### 8. Privacy Impact Assessments

The Company shall carry out Privacy Impact Assessments (PIAs) when and as required under the Regulations. Privacy Impact Assessments shall be overseen by the Company Secretary or HR as appropriate. Areas that shall be addressed by a PIA is detailed in the Company's GDPR User Manual.

## SECTION C – Rights of Data Subjects

This section outlines the rights of Data Subjects and how the Company must ensure that these rights are not infringed.

### 9. The Right to be Informed

The Company shall ensure that the legally required information is provided to every data subject when personal data is collected within the applicable time frame. All such information is contained within our Privacy Notice[s].

### 10. The Right to Access

10.1 A data subject may make a subject access request ("SAR") at any time to find out more about the personal data which the Company holds about them.

10.2 The Company must follow the SAR requirements as detailed in the GDPR User Manual.

### 11. The Right to Rectification of Personal Data

11.1 If a data subject informs the Company that personal data held by the Company is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject's notice.

11.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

### 12. The Right to Erasure of Personal Data

- 12.1 Data subjects may request that the Company erases the personal data it holds about them in certain circumstances as detailed in the GDPR User Manual.
- 12.2 Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request.
- 12.3 In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

### 13. The Right to Restrict Processing of Personal Data

- 13.1 Data subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.
- 13.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

### 14. The Right to Object to Personal Data Processing

- 14.1 Data subjects have the right to object to the Company processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling), and processing for scientific and/or historical research and statistics purposes, in certain circumstances (details of which are included in the GDPR User Manual).
- 14.2 Where a data subject objects to the Company processing their personal data for direct marketing purposes, the Company shall cease such processing forthwith.

### 15. Automated Decision Making & Profiling

The Company does not carry out any automated decision making or profiling in relation to personal data.

### 16. Personal Data

The following personal data may be collected, held, and processed by the Company:

- a. Employee/Director/Consultant data, to administer the employment/director/contractual relationship between these individuals and the Company.

- b. Website users including those who request marketing information about our services, to provide information about such services.

## 17. Transferring Personal Data to a Country Outside the UK

The Company may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the UK, but when doing so, must first comply with the requirements detailed within the GDPR User Manual.

## 18. Data Breach Notification

18.1 All personal data breaches must be reported immediately to the Company Secretary and Directors of the Company.

18.2 Data Breaches must be dealt with in accordance with the procedures laid down in the GDPR User Manual.

## 19. Implementation of Policy

This Policy shall be deemed effective as of 10 March 2020. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

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Revision	Date	Amendment	Content owner	Mandated by
First issue	10 March 2020		Bridgehouse	Kevin O'Leary
Second issue	15 April 2021	Amendments to Introduction and Clause 17 to reflect end of Brexit transition period and technical changes to reflect UK-only application.	Bridgehouse	Kevin O'Leary

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