

This policy applies to all companies under Churchill Contract Services Group Holdings Ltd to include the following subsidiaries and trading names:

- Churchill Contract Services (CCS)
- Amulet (Churchill Security Solutions) (AMU)
- Churchill Environmental Services (CES)
- Churchill Contract Catering t/a Radish (RAD)
- Chequers Contract Services Ltd (CHE)
- Chequers Electrical & Building Services Ltd (CEBS)

The Churchill Group regards achieving compliance on Data Protection measures as a mutual objective for management and employees at all levels. It is therefore company policy within Churchill Group Holdings Limited to guarantee the confidentiality, integrity and availability of data.

The General Data Protection Regulations (2016) and Data Protection Act (1996) applies to everyone who handles or who has access to information about individuals. The Regulation also gives rights to the people the information is about. By law everyone in the workplace must follow the rules set out in the act and help protect individuals' rights.

Management give full backing to this policy and will fully support any persons implementing it. Everyone within the workplace or with supervisory responsibility must recognise the need and accept responsibility for Data Protection. Everyone in the workplace has a legal duty to protect the privacy of information about individuals, to ensure data is up to date and accurate, and to dispose of data in a timely and secure manner. Successful implementation of this policy requires the wholehearted commitment of everyone in the Company and acceptance by individual employees of their responsibilities.

Churchill Service Solutions is the Data Controller under the Act, which means that it determines which personal information is held and how it is used. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

Specifically, the principles require that personal information

- Shall be processed fairly and lawfully
- Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes
- Shall be adequate, relevant and not excessive in relation to those purpose(s)
- Shall be accurate and, where necessary, kept up to date and not stored for longer than is necessary
- Shall be processed in accordance with the rights of data subjects under the Regulations
- Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information.
- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals/service users in relation to the processing of personal information.
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act, including the right to be informed that processing is being undertaken, the right of access to one's personal information, the right to prevent processing in certain circumstances & The right to correct, rectify, block or erase information that is regarded as wrong information.
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred outside the EU without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

Disclosure

Churchill may share data with other agencies such as the local authority, police forces, other enforcement agencies, insurance providers and other service providers as required. The data subjects will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows Churchill to disclose data (including sensitive data) without the data subject's consent.

- Carrying out a legal duty or as authorised by the Secretary of State
- Protecting vital interests of an individual/service user or other person
- The individual/service user has already made the information public
- Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- Monitoring for equal opportunities purposes – i.e. race, disability or religion
- Providing a confidential service where the individual/service user's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill individuals/service users to provide consent signatures

Storage

Information and records containing personal data will be stored securely and will only be accessible to authorised staff. Data will be stored for only as long as it is needed or as required by law or other regulations. It is Churchill's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

Data Access & Accuracy

All individuals have the right to access the information Churchill holds about them. Churchill will also take reasonable steps to ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, Churchill will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with data protection
- Churchill will review and audit the ways it stores and manages personal data

The Churchill Group stresses its commitment to Data Protection, any person failing to adhere to the appropriate security measures or failing to protect against unauthorised or illegal data processing will be considered as gross misconduct and may lead to the severest disciplinary action.

This policy statement may be revised, added to or modified from time to time, and will be supplemented where appropriate, by codes of practice, guidance notes and standards. Changes will be brought to the individual attention of relevant personnel.

The Directors for Churchill Group Holdings Limited fully support this policy and all those who endeavor to carry it out.

This policy will be formally reviewed annually and updated as required.

Signed on behalf of Churchill Contract Services Group Holdings Ltd

A handwritten signature in black ink, appearing to read "J.M. Briggs".

J.M. Briggs, Group CEO

Date: 31/08/2021

Review date: 31/08/2022