GROUP POLICY

Data Protection

April 2026

IMS Ref – 2471-10

Contents

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01.

Group Policy Statement

1.1 McLaughlin & Harvey (the "Company") recognises the importance of respecting the personal privacy of customers, employees and others and the need to put in place appropriate safeguards relating to the processing of personal data.

1.2 Data protection regulates the way in which organisation use personal data about living individuals (whether customers, staff or suppliers) and protects those individuals from unauthorised use or disclosure of their personal data.

1.3 The main piece of legislation governing data protection in the UK is the Data Protection Act 2018, as amended ("the Act"). The Act applies to the Company, the Data Controller for the purposes of the Act, and to anyone who holds information in a structured was so that retrieval is easy. The Company is fully committed to abiding by, not only by the letter, but by the spirit of the Act, and, in particular, is committed to the observation, wherever possible, of the highest standard of conduct mandated by the Act.

1.4 This policy sets out the Company's approach to these matters and to compliance with data protection laws.

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02.

Policy

2.1 In order to comply with the Act, the Company will:

2.1.1 Operate in compliance with the data protection principles;

2.1.2 Ensure any exemptions are applied consistently and accurately in accordance with the law;

2.1.3 Take note of the guidance and standards issued by the Information Commissioner from time to time;

2.1.4 Take note of applicable codes of practice; and

2.1.5 Provide appropriate data protection training.

03.

The Principles of Data Protection

3.1 Article 5 of the Act stipulates that anyone processing personal data must comply with The Data Protection Principles of good practice. These Principles are legally enforceable.

3.2 The Principles require that personal information:

3.2.1 Shall be processed fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

3.2.2 Shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');

3.2.3 Shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

3.2.4 Shall be accurate and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are accurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

3.2.5 Shall not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the personal data processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purpose or statistical purposes in accordance

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with Article 90(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms 03 of the data subject ('storage limitation');

3.2.6 Shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

3.3 The Act provides conditions for the processing of any personal data. It also makes a distinction between personal data and "sensitive" personal data.

3.4 Personal data is defined as, data relating to an identified or identifiable natural person ('data subject');

An identifiable natural person is one which 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.

3.5 Sensitive personal data is defined as personal data consisting of information as to:

- Racial or ethnic origin
- Political opinion • Religious or other beliefs
- Trade union membership
- Physical or mental health or condition
- Sexual life
- Criminal proceedings or convictions
- Genetic data
- Biometric data

04.

Collection and Retention

4.1 The Company collects and uses personal data about living individuals in order to carry on its business. The Company recognises that the lawful and correct treatment of personal data are very important to successful operations and to maintaining trust.

4.2 Any personal data which are processed will have the appropriate safeguards applied to them to ensure compliance with the Act.

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4.2.1 Collection

The Company will only collect personal data that is relevant to the carrying out of its legitimate business purposes and functions in a way that does not prejudice the interests of individuals. The Company will ensure that the data collection is accurate as is possible, given the methods used in collection. The Company will collect no more data than is necessary for the purpose declared.

4.2.2 Data Retention

The Company will keep all personal data up to date, and when no longer required for the Company's legitimate purposes, steps will be taken to destroy it as appropriate. Personal data will be reviewed periodically to check that it is accurate and up to date. Steps will be taken to determine whether retention of that data is necessary, in line with data retention policies.

4.2.3 Sensitive Personal Data

The Company will handle sensitive personal data with particular care. Before collecting or processing sensitive personal data, the Company will ensure that the appropriate notifications to the individuals have been given and any required consents obtained.

05.

Disclosures

5.1 The Company will not allow data collected from individuals to be disclosed to third parties except where, for example:

5.1.1 The individual has consented to the disclosure; or

5.1.2 The Company is legally obliged to disclose the data; or

5.1.3 There is a business requirement to disclose the data which does not prejudice the interests of individuals or breach the Act.

5.2 All requests for disclosure of personal data to third parties should be referred to the Data Protection Officer.

06.

Third Party Data Processing

6.1 Data processing will be allowed where there is a clear purpose for the activity which meets the requirement of the Act.

6.2 Where data are passed to a third party for processing, the Company will ensure that a written contract is put in place that requires the processor to act only on the Company's instructions, not to disclose personal data without specific authority, to provide appropriate operational and technical security and to allow the Company to check that the contract is being complied with.

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6.3 Personal data should not be transferred outside the Company and in particular not to a country outside the EEA:

6.3.1 Except with the data subject's consent; or

6.3.2 Unless that country's data protection laws provide and adequate level of protection; or

6.3.3 Adequate safeguards have been put in place by use of contracts to ensure adequacy.

07.

Security

7.1 The Company has put in place appropriate logical, technical, physical and operational security measures to ensure the security, confidentiality and integrity of personal data against unauthorised or unlawful processing and against the accidental loss or destruction of, or damage to, personal data.

7.2 In particular Personal information should:

- Be kept in a locked filing cabinet, drawer, or safe;
- If it is computerised, be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up;
- If a copy is kept on storage media, that media must itself be encrypted and be kept in a locked filing cabinet, drawer, or safe.

7.3 Data stored on portable electronic devices or removable media is the responsibility of the individual member of staff who operates the equipment. It is the responsibility of this individual to ensure that:

- suitable backups of the data exist;
- sensitive data is appropriately encrypted;
- sensitive data is not copied onto portable storage devices without first consulting the IT Department, in regard to appropriate encryption and protection measures;
- electronic devices such as laptops or PDA's, and computer media (devices, CD-ROM's etc) that contain sensitive data ARE not left unattended when offsite.

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08.

Employee Communications

8.1 Communication plays an essential role in the conduct of the Company's business. How you communicate with people not only reflects on you as an individual but also on the Company.

8.2 The Company values your ability to communicate with colleagues, clients and business contacts, and the Company invests substantially in information technology and communications systems (including e-mail) which enable you to work more efficiently.

8.3 The Company trusts you to use them responsibly and in accordance with the Company's Communications Policy.

09.

Breaches of this Policy

9.1 The Company may take disciplinary action against you if you fail to comply with this policy.

9.2 Please note that the Company may review or change the procedures outlined in this policy, and in any related policy, at any time. The Company will notify you of any changes to this policy.

10.

Further Communication

10.1 If you have an enquiry about this policy or any question about data protection compliance, please contact the Group IT Director.

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