

# GDPR Policy

This policy applies where C W Surfacing Ltd are acting as a data controller with respect to the personal data of staff, visitors and service providers in cases where we determine the purposes and means of the processing of that personal data.

C W Surfacing Ltd are committed to safeguarding the privacy of staff, visitors and services providers. Only trained and authorised staff will process personal data.

C W Surfacing Ltd will only obtain, hold or process such information that is required by law or to facilitate the day-to-day administration of the business. Personal data will not be shared with any organisation outside of the Economic European Union.

Where subject data is collected directly from the subject, C W Surfacing Ltd will explain the lawful reason for obtaining the information, the data retention and the rights of the individual. Data will only be obtained from a third party with the subject data's written permission. The subject will be made aware of the reason the information is being requested, how it will be used and how long it will be stored for.

C W Surfacing Ltd may process personal data where necessary for the defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## Retaining and deleting personal data

Personal data that C W Surfacing Ltd process for any purpose shall not be kept for longer than necessary. Written information will be transferred to C W Surfacing Microsoft Office as soon as possible. The written record will then be shredded before disposal. Written information that is not transferred will be held in secure personnel files. Information held electronically is password protected and can only be accessed by authorised staff. No member of staff is permitted to retain written copies of documents or electronic files on their computer/separate hard drive.

Written information that is no longer required will be shredded before disposal. Electronic files containing sensitive personal information are deleted when no longer required.

Information held on staff that have left is archived until no longer required and then disposed of or deleted as stated above.

C W Surfacing Ltd accept that individuals have the right to view any personal information that is retained. To facilitate the access or amendment of information and withdrawal of consent a series of forms have been created. The completed form must be submitted to the Data Protection Officer who will process the request as appropriate. Under GDPR a charge of £10.00 may be made for this service. Individuals will be asked for a form of photo ID before the information is made available. Where the data subject has requested the information to be forwarded to the electronically, this will only be done to their personal email address.

C W Surfacing Ltd acknowledge the following principal right of the individual under GDPR;

- (a) The right to access;
- (b) The right to rectification;
- (c) The right to erasure;
- (d) The right to restrict processing;
- (e) The right to object to processing;
- (f) The right to data portability;
- (g) The right to complain to a supervisory authority; and
- (h) The right to withdraw consent.

It is the duty of data processors to inform the data controller if they suspect or know of a subject data breach.

In the event of a suspected data breach, C W Surfacing Ltd will inform the subject within 72 hours of becoming aware of the situation. Following a robust investigation into the potential breach a decision will be made as to whether or not it is reportable to the relevant supervisory authority under GDPR regulations. In any event, a record of any breach will be maintained, and steps taken to improve security where appropriate.

Within the scope of the GDPR it is not necessary for C W Surfacing Ltd to appoint a dedicated Data Protection Officer. Most of the personal information that is retained relates to employment, therefore the Head of Business Support has been designated as the person responsible for compliance with GDPR.

Policy Authorised By



Luke Wenham, Director

POL013 RevC

22/10/2025

