



General Data Protection Regulation (GDPR) & UK Data Protection Policy

1. Context and Overview

1.1 Introduction

Cwm Engineering Ltd is dedicated to responsible data management and ensuring full compliance with the UK GDPR, the Data Protection Act 2018, and other applicable data protection laws. In our interactions with customers, suppliers, business contacts, employees, and other associated individuals, we collect, process, and store personal data in a secure and transparent manner.

1.2 Why This Policy Exists

This policy is designed to ensure that Cwm Engineering Ltd:

- Complies with the UK GDPR, Data Protection Act 2018, and industry best practices.
- Protects the rights and freedoms of our staff, customers, and partners.
- Demonstrates transparency regarding our data processing practices.
- Minimises risks related to data breaches and unauthorised disclosure of personal data.

2. Legal Framework

2.1 Applicable Legislation

Cwm Engineering Ltd adheres to:

- The UK General Data Protection Regulation (UK GDPR)
 - The Data Protection Act 2018
- These regulations govern the collection, processing, storage, and sharing of personal data, whether stored electronically, on paper, or in other formats.

2.2 Data Protection Principles

In line with UK GDPR, all personal data must be:

- Processed lawfully, fairly, and transparently.
 - Collected for specific, explicit, and legitimate purposes.
 - Adequate, relevant, and limited to what is necessary.
 - Accurate and, where necessary, kept up to date.
 - Stored in a form that permits identification of data subjects for no longer than necessary.
 - Processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.
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3. Scope and Applicability

3.1 Who This Policy Covers

This policy applies to:

- The head office and any operational sites of Cwm Engineering Ltd.
- All employees, including temporary staff, interns, and contractors.
- All suppliers, partners, and individuals working on behalf of the company.

3.2 Types of Personal Data We Collect

We may collect, process, and store personal data including, but not limited to:

- Full names
- Postal addresses
- Email addresses
- Telephone numbers
- Any other contact details or information necessary for our business relationships

4. Data Protection Risks

Cwm Engineering Ltd recognises risks such as:

- **Breaches of confidentiality:** Accidental or unauthorised sharing of sensitive data.
- **Transparency issues:** Failing to provide clear choices regarding the use of personal data.
- **Reputational damage:** Negative impact due to data breaches or misuse of data.

5. Responsibilities

5.1 Overall Accountability

- **Board of Directors:** Ultimately responsible for ensuring Cwm Engineering Ltd meets all data protection obligations.
- **Data Protection Officer (DPO):**
 - Keeps the Board informed about GDPR and UK data protection responsibilities, risks, and updates.
 - Reviews GDPR procedures and related policies on a regular schedule.
 - Organises regular training and provides advice to all personnel.
 - Manages enquiries and subject access requests.
 - Oversees data disclosure procedures and approves contracts with third parties handling sensitive data.
- **IT Support and Service Providers:**
 - Ensure systems and equipment used to store personal data meet approved security standards.
 - Conduct regular security checks and evaluate third-party services (e.g., cloud storage) for data protection compliance.



5.2 Staff Guidelines

All staff handling personal data must:

- Access data strictly on a need-to-know basis.
 - Avoid informal sharing of personal data and obtain data via the proper channels.
 - Use strong, regularly updated passwords and secure systems.
 - Report any uncertainties regarding data protection practices to their line manager or the DPO.
 - Promptly update or delete data that is outdated or no longer necessary.
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6. Data Storage

6.1 Paper Records

- Store paper-based personal data in locked cabinets or drawers.
- Avoid leaving sensitive documents unattended (e.g., near printers).
- Dispose of paper records securely via shredding when no longer required.

6.2 Electronic Data

- Protect data stored electronically using strong passwords and encryption where applicable.
 - Store data only on designated secure servers or drives—not on personal devices.
 - Regularly back up data and test backup procedures to ensure integrity.
 - Keep removable media secure and locked away when not in use.
 - Ensure all computers and servers have up-to-date security software and firewalls.
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7. Data Use and Data Subject Rights

7.1 Lawful Bases for Data Processing

Cwm Engineering Ltd processes personal data only when:

- The individual has given explicit consent.
- Processing is necessary for the performance of a contract.
- Processing is required to comply with a legal obligation.
- Processing is necessary to protect vital interests.
- Processing is carried out in the public interest or under official authority.
- Processing is necessary for the purposes of legitimate interests, provided these are not overridden by the rights and freedoms of the data subject.

7.2 Data Subject Rights

Individuals have the following rights under UK GDPR:

- **Right of Access:** Request details of the personal data we hold.
- **Right to Rectification:** Request corrections to inaccurate or incomplete data.
- **Right to Erasure:** Request deletion of personal data (subject to certain conditions).
- **Right to Restrict Processing:** Request a limitation on how their data is used.
- **Right to Data Portability:** Request transfer of data in a commonly used format.



- **Right to Object:** Object to data processing based on our legitimate interests.
- **Right to Withdraw Consent:** Withdraw consent at any time where processing is based on consent.

To exercise any of these rights, individuals should contact our Data Protection Officer at [email address].

8. Data Breach Notification Procedures

8.1 Internal Reporting and Response

- All staff must immediately report any suspected or actual data breach to their line manager and the DPO.
- The DPO will assess the breach, document the incident, and implement remedial actions.

8.2 Notification to Authorities

- If a data breach poses a risk to the rights and freedoms of individuals, Cwm Engineering Ltd will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach, as required by UK GDPR.
 - Where necessary, affected individuals will be informed of the breach and advised on steps they can take to protect themselves.
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9. Data Retention Policy

- Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected, unless a longer retention period is required or permitted by law.
 - Data will be reviewed regularly, and outdated or no longer required data will be securely deleted or anonymised.
 - Specific retention periods are determined based on the type of data and relevant legal or contractual obligations.
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10. International Data Transfers

- If personal data is transferred outside the UK or European Economic Area (EEA), Cwm Engineering Ltd will ensure that adequate safeguards are in place. These may include:
 - Adequacy decisions by the European Commission.
 - Standard Contractual Clauses (SCCs).
 - Other legally recognised mechanisms ensuring the protection of personal data.
 - We will inform data subjects if their data is transferred internationally and explain the safeguards used.
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11. Cookies and Website Tracking

- Our website may use cookies or similar technologies to enhance user experience and gather non-personal analytical data.
 - A separate Cookie Policy is available on our website, detailing how cookies are used, the types of cookies, and how users can manage their preferences.
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Plot 4 Strategic Employment Site
Cross Hands East Industrial Estate
Heol Parc Mawr, Cross Hands,
Carmarthenshire SA14 6RE
Tel: +44 (0) 1707 325513
Email: info@cwmenengineering.co.uk
Web: www.elderengineering.co.uk

12. Subject Access Requests

- Individuals wishing to access their personal data can submit a subject access request by contacting our Data Protection Officer at [email address].
- We will verify the identity of the requester before releasing any information.
- Our goal is to respond to subject access requests within 30 days. Complex requests may be extended by up to 2 months, with the individual kept informed.
- In cases where a request is manifestly unfounded or excessive, a reasonable administrative fee may be charged.

13. Disclosing Data for Other Reasons

- In certain circumstances, such as lawful requests from law enforcement or where necessary to protect vital interests, personal data may be disclosed without the data subject's consent.
- Any such disclosure will be subject to a rigorous verification process, involving senior management and legal advisers, to ensure that only the minimum necessary data is shared.

14. Contact Information and Further Guidance

For any questions, further information, or to exercise your data protection rights, please contact:

Data Protection Officer

Cwm Engineering Ltd

Email: info@cwmenengineering.co.uk

Phone: +44 (0) 1707 325513

This policy will be reviewed periodically and updated as necessary to ensure continued compliance with the UK GDPR, Data Protection Act 2018, and other applicable laws. We appreciate your trust and remain fully committed to protecting your personal data.

A handwritten signature in black ink, appearing to read "M D Walters", with a stylized flourish at the end.

Malcolm Walters

Managing Director

On behalf of Cwm Engineering Ltd.