

GDPR Data Protection Policy adopted by The Liiift Up Ltd

Responsibility for updating and dissemination of this policy rests with the co-founders of THE LIIIFT UP LTD. The policy is subject to regular review to reflect changes in legislation. All staff are required to understand, apply and abide by the policy and if in any doubt to seek advice.

All staff, regardless of department, must receive UK General Data Protection Regulation and Data Protection Act 2018 awareness training as part of a signed induction process. Ignorance of the UK GDPR and DPA (2018) is unacceptable.

The Liiift Up Ltd collects and uses certain types of personally identifiable information about clients, customers, employees, associates and suppliers in order to operate. This includes current, past and prospective individuals and entities with whom we conduct business. Personal information, or data, must be dealt with properly however it is collected, recorded and used – whether on paper, electronically, or other means.

The success of our operation and achievement of our objectives depends upon maintaining confidence of those we do business with. Therefore, we need to ensure we treat personal information lawfully and correctly. In doing so, we fully endorse and adhere to the UK GDPR.

In relation to the GDPR, there are 7 Principles and 8 Rights that have to be observed:

<u>Principles</u>

- 1. Legality, Transparency and Fairness
- 2. Purpose Limitation
- 3. Minimisation
- 4. Accuracy
- 5. Storage Limitation
- 6. Integrity and Confidentiality
- 7. Accountability

Rights

- 1. The right to be informed
- 2. The right of access
- 3. The right to rectification
- 4. The right to erasure
- 5. The right to restrict processing
- 6. The right to data portability
- 7. The right to object
- 8. Rights in relation to automated decision making and profiling

We ensure that:

- We complete and regularly update a personal data risk register
- We attend and review a personal data training and awareness program
- We appoint a senior manager with overall accountability and responsibility for personal data

The Liiift Up Ltd 1

- We review and update our data protection policy as new legislation emerges
- We understand what personal data we hold, where it's held and where it goes
- We have a legal basis for our data processing activities
- We understand and properly define our processing activities
- We have enforceable written personal data handling agreements with all third party suppliers
- We carry out appropriate due diligence on all third party suppliers
- We attend to any subject access requests (SAR) in a timely manner (less than one month)
- We rectify, restrict and allow portability of data via safe means
- We review and update our information security policy on a regular basis
- We update our annual registration with the ICO

The Liiift Up Ltd 2