

MTW Data Protection Policy

MTW Consultants Ltd (MTW) is a company (Registered in England and Wales, 05287430) committed to ensuring that it complies with all applicable data protection legislation to ensure that personal and business data obtained is held and processed in accordance with the Principles and the Rights of the data subjects (individuals) detailed in the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

Therefore, we follow procedures which aim to ensure that all who have access to any personal and business data held by or on behalf of MTW, are fully aware of and abide by their duties under the law.

MTW is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal and business data.

1. Statement of policy

In order to operate, MTW has to collect and use information (data) about people with whom we communicate.

This personal and business information must be handled and dealt with properly however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

Given the nature of MTW's service and our aims and principles, we view the lawful and correct treatment of personal and business information as important to our successful operations, and to maintaining the confidence of those with whom we work.

To this end, MTW fully endorses and adheres to the principles of data protection as set out in the GDPR.

2. The principles of data protection

Article 5 of GDPR requires that personal and business data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) 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 not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal and business data which is inaccurate, having regard to the purposes for which it is processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal and business data are processed; personal and business data may be stored for longer periods insofar as the personal and business data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal and business data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The GDPR 2018 provides conditions for the processing of any personal and business data . It also makes a distinction between **personal and business data** and “sensitive” personal and business data, which is now referred to as **special category** data and is broadly similar to the previously titled ‘sensitive’ personal and business data under the old Data Protection Act 1998. There are additional rules for processing special category data.

Personal and business data is defined as data relating to a living individual who can be identified from:

- that data
- that data and other information which is in the possession of, or is likely to come into the possession of the data controller and includes an expression of opinion about the individual and any indication of the intentions of the data controller, or any other person in respect of the individual.

Data and information have the same meaning throughout this document.

3. Handling of personal and business data

MTW will, through appropriate management and the use of strict criteria and controls:

- Observe fully, conditions regarding the fair collection and use of personal and business information.
- Meet its legal obligations to specify the purpose for which information is used.

- Collect and process appropriate information and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements.
- Ensure the quality of information used.
- Apply checks to determine the length of time information is held.
- Take appropriate technical and organisational security measures to safeguard personal and business information.
- Ensure that the rights of people about whom the information is held can be fully exercised.

These include:

- The right to be informed that processing is being undertaken.
- The right of access to one's personal and business information.
- The right to prevent processing in certain circumstances.
- The right to correct, rectify, block or erase information regarded as wrong information.

In addition, we will ensure that:

- There is someone with specific responsibility for data protection in the organisation.
- Everyone managing and handling personal and business information understands that they are contractually responsible for following good data protection practice.
- Everyone managing and handling personal and business information is appropriately trained to do so.
- Everyone managing and handling personal and business information is appropriately supervised.
- Anyone wanting to make enquiries about our handling of personal and business information knows what to do.
- Queries about handling personal and business information are promptly and courteously dealt with.
- Methods of handling personal and business information are regularly assessed and evaluated.
- Performance with handling personal and business information is regularly assessed and evaluated.

- Data sharing is carried out under a written agreement, setting out the scope and limits of the sharing. Any disclosure of personal and business data will be in compliance with approved procedures.

All employees are to be made fully aware of this policy and of their duties and responsibilities, and will take steps to ensure that personal and business data is kept secure at all times against unauthorised or unlawful loss or disclosure. In particular, they will ensure that:

- Paper files and other records or documents containing personal and business/sensitive data are kept in a secure environment.
- Personal and business data held on computers and computer systems is protected by the use of secure passwords.
- Individual passwords are such that they are not easily compromised.

4. Equipment

To protect data that is held by the MTW Consultants, work undertaken as an employee is completed on equipment provided by MTW Consultants.

5. Data Breaches

The GDPR introduces a duty on all organisations to report certain types of personal and business data breach to the relevant supervisory authority. We must do this within 72 hours of becoming aware of the breach, where feasible.

Reportable breaches are those where the breach may result in a risk to people's rights & freedoms – in the case that this is likely, we will report the breach to the ICO.

If the breach is likely to result in a risk of adversely affecting individuals' rights and freedoms, we will also inform those individuals without undue delay.

Signed: _____  _____ Date: April 27th 2025

David McAlpine, Director

MTW Consultants Ltd