

# Data Protection Policy

## 1. Introduction

Andrews Fasteners Limited (hereinafter referred to as "the Company") is committed to protecting the personal data of its employees, clients, partners, and other stakeholders. This policy sets out the Company's approach to ensuring compliance with relevant data protection regulations, including the UK GDPR and the Data Protection Act 2018.



For our Company specific **GDPR Policy** (Issue A3) please visit <https://andrewsfasteners.uk/gdpr>

## 2. Purpose

The purpose of this Data Protection Policy is to outline the Company's commitment to processing personal data in a lawful, fair, and transparent manner. This policy applies to all employees, contractors, and third parties who process personal data on behalf of the Company.

## 3. Scope

This policy applies to all personal data processed by the Company, including data related to employees, clients, suppliers, and other stakeholders. It covers data collected, stored, processed, transmitted, and deleted by the Company, both electronically and on paper.

## 4. Data Protection Principles

The Company adheres to the following key principles of data protection:

- **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimization:** Personal data shall be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date.
- **Storage Limitation:** Personal data shall be kept in a form that permits identification of data subjects for no longer than necessary for the purposes for which the data is processed.
- **Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage, using appropriate technical and organizational measures.
- **Accountability:** The Company shall be responsible for, and able to demonstrate, compliance with the above principles. To achieve this, the Company maintains a Record of Processing Activities (ROPA) as required by Article 30 of the UK GDPR, which documents the purposes of processing, categories of data held, and planned retention periods. These records will be made available to the Information Commissioner's Office (ICO) upon request.

## 5. Legal Basis for Processing

The Company will process personal data based on one or more of the following legal bases:

- The data subject has given consent to the processing of their personal data.
- Processing is necessary for the performance of a contract to which the data subject is a party.
- Processing is necessary for compliance with a legal obligation.
- Processing is necessary to protect the vital interests of the data subject or another person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- Processing is necessary for the purposes of legitimate interests pursued by the Company or a third party, except where such interests are overridden by the rights and freedoms of the data subject.

## 6. Data Subject Rights

The Company respects the rights of data subjects, including the right to access, correct, delete, and restrict the processing of their personal data, as well as the right to object to processing and the right to data portability.

## 7. Data Breach Notification

In the event of a personal data breach, the Company will notify the ICO without undue delay and, where feasible, within 72 hours, unless the breach is unlikely to result in a risk to the rights and freedoms of individuals. Where the breach is likely to result in a high risk to the rights and freedoms of natural persons, the Company will also communicate the breach to the affected data subjects without undue delay. The Company will document all breaches and take immediate appropriate measures to mitigate any possible adverse effects

## 8. Review and Updates

This policy will be reviewed annually and updated as necessary to ensure compliance with data protection laws.

Review date: **25/01/2026**

**Dariusz Więckiewicz**

Change date: **25/01/2026**

Quality Manager