

Data Protection Policy

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Version
V9

Equality Impact Assessed
16/04/25

Information Governance Assessed
16/04/25

Approved by
Thomas Harley

Date of Approval
16/04/25

Date of Review
16/04/26

Classification
Public



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Introduction

This policy sets out Get Sets obligations in respect of data protection and the rights of its clients and business contacts in respect of their personal data under the Data Protection Act 2018. The Data Protection Act 2018 is the UK’s implementation of the (EU) 2016/679 General Data Protection Regulation (GDPR).

This policy should be used in conjunction with Get Set’s Information Security Policy.

Scope

- The requirements of this policy apply to all individuals, processes and systems in all group organisations that have access to, or use, personal data concerning individuals. These include but are not limited to staff, directors, board members, contractors and all other parties working on behalf of the firm.
- This policy covers Get Sets obligations regarding the collection, processing, transfer,

storage, and disposal of personal data.

- Get Set is committed to the proper, lawful, and fair processing of all personal data, respecting the legal rights, privacy and trust of all individuals involved.
- Breaches of confidentiality and failure to respect the rights of individuals can result in fines, legal action, and reputational damage.

Definition of key terms

- The GDPR defines personal data as any information relating to an identified or identifiable living person, a “data subject”. An identifiable living person is one who can be identified directly or indirectly by reference to an identifier such as name, an identification number, location data, an online identifier, or other factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.
- “Special category data” (also known as sensitive personal data) relates to data that reveals the data subjects racial or ethnic origin, political opinions, religious and philosophical beliefs, genetic data, biometric data used for the purpose of identifying a natural person, health data, sexual orientation, and trade union membership.
- “Data controller” refers to a person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- “Data processor” refers to a person, public authority, agency, or other body which processes personal data on behalf of the controller.

The data protection principles

- Get Set is committed to the data protection principles which require data to be:
 - Processed lawfully, fairly and in a transparent manner;
 - Collected only for the specific and legitimate purposes and not for any other purpose, excluding certain exemptions, for example public interest;
 - Adequate, limited and relevant to fulfill the purpose for which it is collected;
 - Accurate and when required kept up to date;
 - Retained for no longer than is necessary period for which it is required;
 - Processed and protected in a manner that protects against unauthorised or unlawful processing, accidental loss, modification, destruction or damage;

Get Set’s position on each of the above principals will be detailed below.

Lawful, fair, and transparent data processing and consent

- Data should be collected and processed only when it is fair, transparent and when there is lawful basis to do so, without effecting the rights of the data subject. Get Set is committed to ensuring one of more of the following apply when processing data:
 - The processing is required for contract performance;
 - Consent has been granted by the data subject, or where the data subject is under the age of 13 consent has been granted by the parent or guardian;
 - Informed rights in relation to the withdrawal of consent;
 - For the performance of a task carried out in relation to public interest;

- For the performance of a task in relation to an official authority;
 - Where it is necessary to comply with legal obligations;
 - To protect the vital interests of the data subject or another natural person;
 - Where it is necessary for the purposes of legitimate interests, except where such interests require protection and are overridden by the rights of the data subject;
 - Where obtained from a third party, confirmation of obtainment within one month of the data being received.
 - There is lawful basis to collect and process data and special category data;
- Get Set is committed to ensure the lawful processing of special category data is met with one or more of the following:
 - Identify both a lawful basis under Article 6 of the UK GDPR and a condition for processing under Article 9;
 - Considered whether the risks associated with the use of special category data affect other obligations around data minimization and security;
 - Explicit consent has been obtained for the processing related to personal data or that has clearly been made public by the data subject;
 - To protect the vital interests of the data subject or another natural person where they are physically or legally incapable or giving consent;
 - For the conditions of public interest.

Purpose limitation

The data subject is kept informed on the purposes of processing. Personal data is collected and processed when directly from the data subject or other third parties.

Data minimisation

Personal data is only collected and processed when necessary for the specific purpose or purposes of which data subject has or will be informed. Data held will be reviewed in accordance with Get Sets Data Retention Policy.

Data accuracy and up to date records

Personal data collected, processed, and held is accurate and up to date, including the rectification of personal data at the request of the data subject. Personal data is checked by employees on an ongoing basis and where necessary inaccurate data is reviewed for removal or amendment, as appropriate.

Storage limitation

- Personal data is not held for any longer than is necessary.
- Personal data is held in accordance with the purposes of processing for which the data was originally collected and processed.
- When personal data is no longer required, reasonable steps are taken without undue delay to erase or dispose of such data.
- Data retention and employees' obligations in respect of data retention is detailed further within Get Sets Data Retention Policy.

Integrity and confidentiality

Personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing. Personal data is protected against accidental loss, destruction, or damage and in accordance with Get Sets Clear Desk Policy.

The rights of the data subject

- Get Set is committed to the rights of the data subject which are as follows:
 - To be informed why, where and the period for which data is held;
 - Access rights of the data subject;
 - Rectification and correction of data;
 - The right of erasure;
 - Restrictions of data processing;
 - Data portability;
 - To object to the processing of such data;
 - Automated decision making and profiling.

Risk assessment

- Get Set reviews all processes in relation to collection, storage, use and disposal of personal data while reviewing the value, sensitivity, and confidentiality of such data.
- Consideration is taken when reviewing the damage, distress or impact on the data subject should data be intentionally and unintentionally breached. Get set identify the most suitable measures for this purpose and detail such within the Data Security Policy.

Commitment

- Get Set is committed to protect the data of all Participants in relation to business activities. Where personal or sensitive data is collected by Get Set, appropriate steps will be taken to ensure the protection of such data and where necessary, to ensure consent is gained to hold, use, and retain personal data. Personal data and its privacy is protected by means of a number of organisational, technical and physical measures.
- Get Set is committed to the obligations in respect of the Equality Act 2010 and any information that where necessary, is shared in relation to safeguarding of young children and vulnerable adults.
- Get Set is committed to ensuring employees have the following:
 - Guidance and training for handling personal data;
 - Reporting lines and supervisory framework;
 - Assessments and monitoring of data processing systems;
 - A Data Protection Lead with overall responsibility for Data Protection.
- Get Set employees will be committed to the following:
 - Understand the purposes of which Get Set handle personal data;
 - Observe guidance, codes of conduct and procedures on the use and handling of personal data to ensure data protection and privacy;
 - Collect and process personal data within the perimeter of the role or in accordance with what is required by the company to meet its business or legal requirements;

- Personal data is destroyed in accordance with company policy and data protection law;
- Personal data is not sent outside of the UK without prior authorisation from management;
- Due care is taken to ensure information input, documented, and held is true and correct.

Data breaches

- Get Set encourage employees to take a proactive approach when raising issues and concerns in relation to breaches of personal data, in line with the following:
 - Employees should remain vigilant when identifying breaches of personal data;
 - Evidence of data breaches should not be removed or destroyed as this may in turn compromise the investigation of such breach;
 - Any notification of data breaches should be reported to the employee's line managers and brought to the attention of the Data Protection Lead without due delay.

Breaches of this policy

Data Protection is the responsibility of all Get Set employees. Breaches of this policy may result in disciplinary action or dismissal. Any concerns or known breaches of this policy should be brought to the attention of Gets Set's Data Protection Officer, Cat Steel at DPO@getsetuk.co.uk.

Policy Review

This policy shall be reviewed annually and amended accordingly at intervals not exceeding 12 months.

Version Control

| Version | Date | Purpose / Changes | Author |
|---------|------------|-------------------|----------------|
| V1 | 01/08/2016 | Policy Draft | Thomas Harley |
| V2 | 01/08/2016 | Policy Ratified | Thomas Harley |
| V3 | 01/02/2020 | Policy Review | Thomas Harley |
| V4 | 01/01/2021 | Policy Review | Thomas Harley |
| V5 | 26/04/2021 | Policy Updated | Jasmine Fuller |
| V6 | 26/04/2022 | Policy Review | Cat Barton |
| V7 | 26/04/2023 | Policy Review | Cat Steel |
| V8 | 26/04/2024 | Policy Review | Cat Steel |
| V9 | 26/04/2025 | Policy Review | Cat Steel |
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