



| | | | |
|----------------|--------------------------|------------------------------|--------------|
| Policy ID: P05 | Last Review: 05 May 2026 | Next Review: 10 January 2027 | Version: 3.0 |
|----------------|--------------------------|------------------------------|--------------|

DATA PROTECTION POLICY (GDPR)

This policy sets out MW Fire Ltd's approach to data protection in compliance with the UK Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). It applies to all personal data processed by the company, whether held electronically or in physical form.

This policy applies to all employees, subcontractors, and anyone acting on behalf of MW Fire Ltd. All personnel are required to be familiar with this policy and to comply with its terms. Failure to do so may result in disciplinary action, up to and including dismissal.

1. Data retention

MW Fire Ltd is committed to ensuring that all personal data is handled in accordance with the following principles:

- 3.1 Data will be processed lawfully, fairly, and transparently, and only where a valid lawful basis exists (such as consent, contract, or legal obligation).
- 3.2 Data will be collected for specified, explicit, and legitimate purposes only, and will not be used in a manner incompatible with those purposes.
- 3.3 Data will be adequate, relevant, and limited to what is necessary in relation to the purpose for which it is processed.
- 3.4 Data will be kept accurate and, where necessary, up to date.
- 3.5 Data will not be retained for longer than is necessary for the purpose for which it was collected.
- 3.6 Data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage.

2. Lawful Basis for Processing

Before collecting or processing any personal data, MW Fire Ltd will ensure that a lawful basis for doing so has been identified and documented. Where consent is relied upon, it will be freely given, specific, informed, and unambiguous. Consent may be withdrawn at any time, and the company will act on such withdrawal promptly.

3. Types of Personal Data Held

Personal data held by MW Fire Ltd may include: names, contact details, financial and payroll information, employment records, qualifications and certificates, and where relevant, special category data such as ethnic origin or health information. Data is used for personnel, administrative, financial, regulatory, and business development purposes.



4. Data Retention

Personal data will not be retained for longer than is necessary. When an employee or subcontractor ceases working for the company, their details will be removed from active systems. However, where the nature of the work requires it, certain records may be retained for up to six years. This applies principally to technical staff whose details appear on installation certificates or BAFE-registered documentation, such as commissioning and certification records bearing an engineer's signature.

Physical records that are no longer required will be disposed of securely by shredding.

5. Individual Rights

MW Fire Ltd recognises and will respect the following rights of individuals under UK GDPR:

5.1 The right to be informed about how their data is used.

5.2 The right of access to personal data held about them.

5.3 The right to rectification of inaccurate or incomplete data.

5.4 The right to erasure (the right to be forgotten). Upon a valid request from the data owner, the company will delete the information it holds. Where data has been shared with third parties, the individual will need to contact those parties directly, although the company will offer reasonable assistance where it is able to do so.

5.5 The right to data portability, where data will be provided in a usable format upon request.

5.6 The right to object to processing, which the company will acknowledge and act upon accordingly.

6. Data Security

The company maintains confidential records on secure, cloud-based platforms. Technical and organisational security measures governing IT systems, devices, access controls, and data handling procedures are addressed in the company's Information Security Management System (ISMS) policy, which should be read alongside this document.

Personal data will not be held on personal mobile phones, laptops, or home computers without prior written authorisation.

The company will periodically review its security arrangements to ensure ongoing compliance with UK GDPR.

7. Data Breach Notification

In the event of a personal data breach, the company will assess the risk to individuals without delay. Where a breach is likely to result in a risk to the rights and freedoms of individuals, it will be reported to the Information Commissioner's Office (ICO) within 72 hours of the company becoming aware of it. Where the risk is assessed as high, affected individuals will also be notified directly and promptly.

8. Access to Data and Need-to-Know

Personal data will only be shared with parties who have a legitimate need to access it. Before sharing any data, the request will be assessed on a need-to-know basis. As a general guide, clients may appropriately receive relevant training records; suppliers generally would not.

Third-party organisations and cloud service providers used to store or process data will be assessed for UK GDPR compliance before use.

9. The Company Website

MW Fire Ltd does not collect or analyse information about traffic to its website, and does not use marketing analytics software such as Google Analytics. Certain technical data (such as IP addresses) may be captured automatically by standard web hosting infrastructure, but this data is not examined or used for any purpose by the company. A separate Privacy Policy is available covering the company's website data practices in full.

10. Management and Accountability

The company's management team is responsible for the day-to-day implementation of this policy. The Nominated Data Controller is Elizabeth Walker, HR Manager.

GDPR training records for company staff are available to clients and relevant interested parties upon request.

This policy will be reviewed annually and reissued to all staff to ensure continued compliance with UK data protection law.