

Introduction

FlipFix Limited recognises the importance of protecting personal data and handling it responsibly, lawfully and securely. Personal data is processed by us in the course of our business activities for a range of operational, administrative, legal and contractual purposes.

This policy sets out our approach to data protection and our commitment to safeguarding personal data relating to employees, workers, applicants, customers, suppliers and other individuals with whom we interact.

Application of this Policy

This policy applies to all directors, officers and employees, including temporary workers, contractors, consultants and any other individual who processes personal data on behalf of FlipFix Limited.

It applies to personal data held or processed in any form, including electronic systems, emails, databases, paper records and other physical or digital media.

Legal and Regulatory Framework

This policy supports our compliance with applicable data protection legislation, including the UK GDPR and the Data Protection Act 2018. The Data Protection Act 2018 supplements the UK GDPR framework for most general processing of personal data in the United Kingdom.

We will also take account of relevant regulatory guidance, including guidance issued by the Information Commissioner's Office, when applying and reviewing our data protection arrangements.

Data Protection Principles

In processing personal data, we seek to act in accordance with the core principles of data protection. Personal data should be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes, and not used in a way that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary;
- Accurate and, where necessary, kept up to date;
- Kept no longer than necessary for the purposes for which it is processed;
- Handled in a way that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage; and
- Processed in a way that demonstrates accountability.

Responsibilities for Management and Employees

Senior Management is responsible for overseeing the implementation of this policy and for ensuring that appropriate procedures, safeguards and controls are maintained in relation to personal data processed by FlipFix Limited.

Those with responsibility for managing staff, systems, records or business processes must take reasonable steps to ensure that personal data is handled in line with this policy and any related procedures or notices.

All employees and other individuals covered by this policy are expected to process personal data only where necessary for legitimate business purposes, to follow Company procedures and instructions, and to take reasonable care to protect the confidentiality, accuracy and security of personal data.

Personal data must not be accessed, used, disclosed, retained or shared improperly.

Collection, Use and Retention of Personal Data

We may collect and process personal data where this is necessary for purposes including employment, customer and supplier relationships, service delivery, administration, legal compliance, business operations and other legitimate purposes connected with our activities.

We aim to ensure that the personal data we hold is relevant, accurate and not excessive in relation to the purposes for which it is processed. Where appropriate, individuals may be asked to assist in keeping their information up to date.

Personal data will be retained only for as long as necessary for the purpose for which it was obtained, or for as long as required to meet legal, accounting, regulatory, audit or other legitimate business requirements. Different categories of records may be retained for different periods depending on the nature of the data and the reason it is held.

Data Sharing and Third Parties

Personal data may be shared internally where there is a legitimate business need to do so, and externally where sharing is necessary for a range of purposes, including lawful business purposes, contractual performance, professional advice, regulatory compliance, legal obligations or other permitted reasons.

Where we use third-party service providers to process personal data on our behalf, we will seek to ensure that such arrangements include appropriate safeguards and responsibilities.

Data Subject Rights and Requests

Individuals may have legal rights in relation to their personal data, including rights of access, rectification, erasure, restriction, objection and, in some cases, data portability, subject to applicable law and any relevant exemptions.

Any request relating to personal data or data protection rights should be referred promptly to a Director, or through the appropriate internal reporting procedure so that it can be considered and responded to in accordance with applicable requirements.

Reporting Concerns and Personal Data Incidents

Any actual or suspected personal data breach, loss of personal data, unauthorised disclosure, inappropriate access, or other data protection concern must be reported without delay to a Director or through the appropriate internal reporting procedure.

We will assess reported incidents and take such steps as are reasonably necessary to investigate, contain, mitigate and, where required, escalate the issue. Personal data incidents may also give rise to reporting or notification obligations under applicable law.

Monitoring and Review

We will keep this policy and the arrangements supporting it under periodic review to ensure they remain appropriate, effective and aligned with legal and operational requirements.

Reviews may also be carried out when there are changes to legislation, guidance, systems, working practices, business operations or following a relevant incident or identified weakness.

Employees are encouraged to raise suggestions for improvement where they identify areas in which data protection arrangements could be strengthened.

Approval and Ownership

This policy is owned by Senior Management, who are responsible for overseeing its implementation and ensuring that appropriate measures, procedures and standards are maintained.

The policy has been approved by the Board of Directors.

For any questions regarding this policy, please contact a Director.