

Data Protection & Privacy Policy

Owner: HR Advisor

Approved by: Managing Director

Effective Date: 23/12/2025

Review cycle: Annual

1. Purpose

LLUK is committed to protecting personal data and processing responsibly in accordance with:

- UK GDPR
- Data Protection Act 2018
- Applicable data protection legislation

This policy outline how we collect, use, store, and protect personal data relating to employees, applicant, contractors, and suppliers.

2. Scope

This policy applies to:

- All employees
- Agency staff
- Contractors
- Consultants
- Suppliers where personal data is processed

It covers all personal data processed for:

- HR and payroll
- Health & safety
- Supplier management
- Legal and compliance purposes

3. Lawful Basis & Principles

We process personal data:

- Lawfully, fairly, and transparently

- For specified, legitimate business purposes
- Only where necessary and proportional
- With appropriate accuracy and security controls
- For no longer than required

Lawful bases may include:

- Contractual necessity
- Legal obligation
- Legitimate interests
- Consent where required

4. Data Subject Rights

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure where applicable
- Restrict or object to processing
- Data portability where legally applicable

Requests will be handled within statutory timeframes.

5. Security Measures

We protect personal data through:

- Role-based access controls
- Secure digital storage and password protection
- Restricted physical file access
- Staff awareness and confidentiality obligations
- Data breach reporting procedures

6. Data Breach Management

- All suspected data breaches must be reported immediately.
- Breaches will be assessed and, where required, reported to the ICO within statutory timeframes.
- Affected individuals will be informed where legally required.

7. Data Retention

Personal data is retained:

- In line with statutory requirements
- Only as long as necessary for business or legal purposes
- According to a documented retention schedule

Data is securely deleted or destroyed when no longer required.

8. Third-Party Processors

Where third parties process data on our behalf:

- Due diligence is carried out
- Written contracts are in place
- Appropriate security and confidentiality measures are required

International transfers are subject to appropriate legal safeguards.

9. Responsibilities

Directors	Ensure appropriate resources and oversight
Managers	Ensure data is handled correctly in their teams
Employees	Follow this policy and report concerns

10. Contact

For data protection queries or requests:

Data Protection Lead: HR Advisor / Consultant

Contact: Sue Spanswick | hr@lluk.co