

GDPR & Data Protection Policy

Introduction

Blake and White is committed to protecting the privacy and security of personal data. This policy explains how we collect, process, and protect personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Scope

This policy applies to current and former employees, workers, volunteers, interns, apprentices, consultants, job applicants, customers, suppliers, and other individuals whose data is processed by the Company (collectively referred to as "data subjects").

Data Protection Principles

Blake and White is committed to the following principles:

1. **Lawfulness, fairness, and transparency:** Data will be processed fairly and lawfully, with transparency about how it is used.
2. **Purpose limitation:** Data will only be collected for specified, explicit, and legitimate purposes.
3. **Data minimisation:** Data collected will be adequate, relevant, and limited to what is necessary.
4. **Accuracy:** Data will be kept accurate and up to date.
5. **Storage limitation:** Data will not be retained for longer than necessary.
6. **Integrity and confidentiality:** Data will be processed securely to ensure protection against unauthorised or unlawful processing.

Personal Data and Processing

- **Personal data** includes any information that identifies a data subject, either alone or in conjunction with other information.
- **Special categories of data** include information on race, religion, health, or sexual orientation, which require additional protections.

Legal Basis for Processing

Blake and White processes personal data based on:

- Performance of a contract.
- Compliance with legal obligations.

- Legitimate interests, where these are not overridden by the rights of data subjects.

Data Subject Rights

Data subjects have the following rights:

1. **Access:** To request access to personal data the Company holds about them.
2. **Correction:** To request rectification of inaccurate or incomplete data.
3. **Erasure:** To request the deletion of data when it is no longer necessary or lawfully processed.
4. **Restriction:** To request restriction of processing in certain circumstances.
5. **Data portability:** To receive a copy of their data in a structured, commonly used format.
6. **Objection:** To object to data processing based on legitimate interests or for direct marketing.
7. **Withdraw consent:** To withdraw consent where processing is based on consent.
8. **Complaint:** To lodge complaints with the Information Commissioner's Office (ICO).

Data Breaches

The Company has procedures to identify, report, and manage personal data breaches. Breaches that pose risks to data subjects' rights and freedoms will be reported to the ICO within 72 hours.

Security Measures

We implement technical and organizational measures to safeguard personal data, including:

- Secure storage systems and encryption.
- Access controls and authentication.
- Regular staff training on data protection responsibilities.

Sharing and Transfers of Data

- Data will only be shared with third parties for legitimate purposes and under confidentiality agreements.
- Data transfers outside the UK will comply with UK GDPR requirements, ensuring equivalent protection.

Data Retention

Personal data will be retained only as long as necessary for the purposes for which it was collected, in line with our Data Retention Policy.

Responsibilities

The Data Protection Manager (DPM) is responsible for overseeing compliance with this policy. Queries and subject access requests should be directed to:

Data Protection Manager Nico Matley, Blake and White, Somborne Estate, Winchester Road, Hampshire SO20 6QT Email: hello@blakeandwhite.com

Updates

This policy may be updated from time to time to reflect changes in legal or regulatory requirements or our operations. Data subjects will be notified of significant changes.

Blake and White takes data protection seriously and is committed to fostering a culture of accountability and transparency in handling personal data. For further details, please contact our Data Protection Manager.