

**ENGINEERED SYSTEMS (ELECTRICAL) LTD**  
**Unit 1 Waterside Industrial Park, Waterside Road,**  
**Leeds, LS10 1RW**

**GENERAL DATA PROTECTION REGULATION POLICY**

ENGINEERED SYSTEMS (ELECTRICAL) LTD are fully committed to compliance with the requirements of the General Data Protection Regulation (GDPR) and therefore follow procedures that aim to ensure their employees, suppliers and contractors who have access to any personal data held by, or on behalf of ENGINEERED SYSTEMS (ELECTRICAL) LTD are fully aware of, and abide by, their duties and responsibilities.

Any personal or sensitive personal data must be handled and dealt with properly, however it is collected, recorded, and used, and whether it is on paper, on computer or by any other means.

ENGINEERED SYSTEMS (ELECTRICAL) LTD regards lawful and correct treatment of personal data as very important to operating successfully and maintaining confidence between companies we conduct business with.

As required under the regulation we ensure that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, up to date; every reasonable step must be taken to ensure that personal data, which is inaccurate, having regard to the purposes for which it is processed, are erased, or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods in so far as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

When personal data is processed, it must be in conjunction with at least one of the following lawful bases.

- **Consent** - the individual has given clear consent for us to process their personal data for a specific purpose.
- **Contract** - the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.
- **Legal obligation** - the processing is necessary for us to comply with the law (not including contractual obligations).
- **Vital interests** - the processing is necessary to protect someone's life.
- **Public task** - the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- **Legitimate interests** - the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

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**GENERAL DATA PROTECTION REGULATION POLICY (CONTINUED)**

We have in place appropriate criteria and controls to enable us to comply with our legal duties under the act. This policy shall be reviewed on a regular basis.

**Signed by the Executive Responsible for Data Protection:**



**Michael Keith**  
**Managing Director**  
**Date: 28<sup>th</sup> August 2023**