

# GDPR Policy

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## Purpose

In the UK, the collection, use and other Processing of Personal Data (as defined below) is governed by the General Data Protection Regulation (“GDPR”) which superseded the UK Data Protection Act 1998 on 25 May 2018. During its business, Tyler Grange Group Limited collects and uses information relating to individuals including employees, shareholders, vendors, and others.



Collection and use of this information is subject to regulation under the GDPR.

The purpose of this policy is to ensure all employees of Tyler Grange Group Limited are aware of the personal data Tyler Grange Group Limited processes and stores and our collective responsibility to protect it in compliance with applicable data protection requirements.

### Scope

This policy applies to all staff using Tyler Grange Group Limited IT and data systems (including officers, employees, contractors, consultants and agency workers). Adherence to this policy may be limited to the extent required or where expressly permitted by an applicable law, rule or regulation.

### Responsibility

"Personal Data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Personal Data Breach" means unauthorised acquisition, access, manipulation, use or disclosure of Personal Data.

"Processing" (and its cognates) means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### Personal Data

The following outlines the different types of data processing conducted by Tyler Grange Group Limited during the normal course of its business:

#### STAFF ADMINISTRATION

This includes all employees, office holders, temporary and casual workers, agents and consultants. The data are processed for the purpose of appointments or removals, pay, discipline, training, superannuation, work management and other personnel matters in relation to our staff administration.

#### ACCOUNTING RECORDS

This is processing for the purpose of keeping accounts relating to Tyler Grange Group Limited.

Data are processed for a supplier or person for the purpose of keeping records for purchases and transactions, to ensure payments, deliveries and services provided.



## SHAREHOLDER RECORDS

The shareholder record contains an individual's name, address and Tyler Grange Group Limited shareholding.

## COMPANY RECORDS

This includes names and addresses of supplier and customer companies which are processed, usually in databases, for the purpose of establishing, managing and maintaining compliance with contracts through our normal course of business.

## Legal and Regulatory Requirements

### COMPLIANCE WITH LAW

Tyler Grange Group Limited shall comply with all applicable laws and regulations, including GDPR.

### PURPOSE LIMITATION AND JUSTIFICATION

Tyler Grange Group Limited shall Process Personal Data only for specified, relevant and legitimate business purposes, or required by applicable laws or regulations. Unless required or permitted by applicable law or regulation or based on consent. Tyler Grange Group Limited shall only use Personal Data for purposes for which the Personal Data was collected, and this is outlined against each processing activity below.

Tyler Grange Group Limited shall only Process Personal Data to the extent it has a legal basis to do so, such as: its legitimate interests in managing its relationships with individuals and administrative purposes; as required by law; to carry out its obligations under contracts; and, where applicable, based on individuals' separately obtained consent.

Where Tyler Grange Group Limited is required by law or internal policies to request and receive the consent of an individual prior to the Processing of certain Personal Data, Tyler Grange Group Limited shall seek such consent and honour it. Tyler Grange Group Limited shall keep a record of such consents obtained and put in place an effective means for individuals to withdraw their consent.

### Proportionality, Integrity and Retention

Tyler Grange Group Limited shall limit the Processing of Personal Data to what is necessary and proportionate considering the pursued purposes and will use reasonable means to keep Personal Data accurate, complete, up-to-date and reliable for their intended use and redact / not record information that is not relevant to the purpose.

In the development and design phases of its Processing operations, Tyler Grange Group Limited shall take into consideration and document the privacy principles of privacy-by-design and privacy-by-default.



By design: Implement measures to help comply with data protection principles e.g., pseudonymisation and data minimization.

By default: Implement privacy settings so that only necessary personal data are processed.

In compliance with Tyler Grange Group Limited's data retention policies, Tyler Grange Group Limited shall retain Personal Data for only as long as needed to meet the legitimate business purposes for which the information was collected and as required by applicable laws or regulations. Where Personal Data are no longer needed in a form that allows for the identification of the individual concerned, the Personal Data shall be deleted or rendered anonymous.

## Transparency

Tyler Grange Group Limited shall inform individuals in a clear and conspicuous manner of the purposes of the Processing, categories of Personal Data collected, the identity of the company Processing Personal Data, how to contact the data protection officer with any inquiries or complaints, and the choices and means offered for limiting use and disclosure of Personal Data.

Individuals shall be provided with any additional information required by applicable law or regulation, including the appropriate data retention period for the information provided where required. Where, in exceptional circumstances, applicable law or regulation may provide for exceptions or relaxations to the transparency requirement, for example, where providing such information imposes a disproportionate burden and such exceptions or relaxations should not be relied upon without prior consultation of the Data Protection Officer in the first instance.

## Rights of Individuals

Tyler Grange Group Limited shall consider requests made by individuals for access, rectification, restriction, opposition, erasure, portability and not to be subjected to solely automated decision-making and shall comply with such requests where required to do so by law or Tyler Grange Group Limited policies. For example, see the section on subject access requests below.

## Disclosures to Third Parties

Tyler Grange Group Limited shall disclose Personal Data to third parties only for sound business reasons, as permitted by or as required by law (including disclosures to law enforcement authorities pursuant to a valid request seeking such Personal Data), to protect the interests of Tyler Grange Group Limited, or with the authorisation of the individual concerned.

Tyler Grange Group Limited may disclose Personal Data to service providers provided suitable contractual guarantees are put in place that require service providers to safeguard



and appropriately protect Personal Data and that prevents them from any further uses or unauthorised disclosures.

## Security

Tyler Grange Group Limited shall implement appropriate administrative, technical, and physical measures to safeguard and appropriately protect Personal Data from unauthorised use, disclosure, destruction, and alteration. Such safeguards will consider the state of the art and sensitivity of the Personal Data concerned.

Where documents containing Personal Data are disposed of, employees should ensure that they are destroyed. This may involve the permanent removal of the documents from the server, so that they do not remain in an employee's inbox or trash folder. Hard copies of documents containing Personal Data may need to be confidentially shredded. Employees should be careful to ensure that such documents are not disposed of in a wastepaper basket / recycle bin.

## Data Breach

In the event of a suspicion of or an actual Data Breach such suspicion shall be reported to the Board and Data Protection Officer to take corrective measures and proceed according to the data breach response plan. Where an actual breach is identified the supervising authority shall be notified with 72 hours.

## International Transfers

Tyler Grange Group Limited shall only transfer or disclose Personal Data to entities, including Tyler Grange Group Limited affiliates, located in countries outside the EEA (including the UK once it is no longer part of the EEA) or Switzerland where:

- suitable safeguards are in place to ensure that the Personal Data will be appropriately protected in the country of receipt, such as legal clauses in terms or contracts.
- there is a legally acceptable exemption to permit the transfer; and
- or other means approved by the Data Protection Group are in place.

For further guidance on the transfer of personal data outside the UK, please contact the Data Protection Officer.

## Privacy Impact Assessments

Where required by applicable law, Tyler Grange Group Limited shall conduct privacy impact assessments for Processing operations presenting significant risks for the individuals concerned.

## Record of Processing Operations

Tyler Grange Group Limited shall maintain a centralised record of Processing operations. The record shall be made available to competent authorities upon request.



## Data Protection Notification

Tyler Grange Group Limited processes data for the purposes outlined above and has therefore registered with the Information Commissioners Office (ICO) [www.ico.gov.uk/notified](http://www.ico.gov.uk/notified).

The details of Tyler Grange Group Limited registration are:

Data Controller Name / Contact: Tyler Grange Group Limited (UK) Ltd / James Harmer  
Registration Number: ZA649993

Tyler Grange Group Limited process and control data in line with the Data Protection Principles:

- For example, data is secure, adequate, relevant and not excessive, is not shared with other countries outside the EEA. Data is accurate and not kept for longer than necessary.

## Subject Access Requests

Individuals may request certain information held on them by the Company. The request should be made by submitting a request in writing.

Tyler Grange Group Limited must comply with access requests promptly and in any event within 30 days of receipt of the request, or if later, within 30 days of receipt of the information required (i.e. to satisfy itself as to the identity of the person making the request and to locate the information that they seek).

Tyler Grange Group Limited does not need to comply with a request where it has already complied with a similar request from the same individual unless a reasonable interval has lapsed.

If in complying with a request Tyler Grange Group Limited will disclose information relating to an individual other than the requestor, there are only two circumstances in which Tyler Grange Group Limited is obliged to comply:

- 1) Where the other individual has consented to the disclosure of the information; or
- 2) Where it is reasonable in all circumstances to comply with the request without the consent of the other individual.

In interpreting what "reasonable" is for the purposes of the above, regard shall be had to the following:

- Any duty of confidentiality owed to the other individual.
- Any steps taken by Tyler Grange Group Limited with the view to seeking the consent of the other individual; and
- Whether the other individual is capable of giving consent, and



- Any express refusal of consent by the other individual.

If Tyler Grange Group Limited is satisfied that it will not be possible to identify the other individual from the information, considering any other information which, in the reasonable belief of Tyler Grange Group Limited, is likely to be in the requestor's possession (or to come into their possession), then Tyler Grange Group Limited must provide the information.

If in complying with the supply of copies of the information it is unintelligible without explanation, the requestor should be given explanation of that information e.g. where Tyler Grange Group Limited holds the information in coded form which cannot be understood without the key to the code.

Where a decision significantly affecting an individual is, or is likely to be, made about them by fully automated means, for the purpose of evaluating matters about them such as their performance at work, their creditworthiness, reliability or conduct, they are entitled to be told of the logic involved in that process. Tyler Grange Group Limited is not required to do this where the information in question constitutes a trade secret.

### Policy Breaches

If an employee acquires any Personal Data in error, by whatever means, he/she shall inform the Data Protection Officer immediately and, if it is not necessary for him/her to retain that Personal Data, arrange for it to be handled by the appropriate individual within the organisation.

All employees are under an obligation to ensure that they comply with this policy when accessing, using or disposing of Personal Data. Failure to observe this policy may result in disciplinary action, up to and including dismissal.

*Written by:*

James Harmer

James Harmer  
Finance Director

Date: 22/01/2025

*Reviewed by:*

A handwritten signature in black ink, appearing to read 'Jon Berry'.

Jon Berry  
Managing Director

Date: 22/01/2025