

## **Data Protection Policy**

### **1. Introduction**

**1.1** Patrolsec is committed to ensuring the security and protection of all personal information that we process, and to provide a compliant and consistent approach to data protection. We recognize our obligations under data protection laws and are committed to complying with them.

**1.2** This policy sets out our approach to data protection and the procedures that are to be followed in relation to personal data.

### **2. Scope**

**2.1** This policy applies to all employees, contractors, volunteers, and stakeholders who process personal data on behalf of Patrolsec.

### **3. Data Protection Principles**

Patrolsec will follow the data protection principles as outlined in data protection legislation. These principles state that personal data must be:

**3.1.1** Processed lawfully, fairly, and transparently.

**3.1.2** Collected only for specified, explicit, and legitimate purposes.

**3.1.3** Adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

**3.1.4** Accurate and kept up to date.

**3.1.5** Retained for no longer than is necessary for the purposes for which it is processed.

**3.1.6** Processed in a manner that ensures appropriate security of personal data.

**3.2** In addition to the above principles, Patrolsec will ensure that data is:

**3.2.1** Processed fairly and lawfully.

**3.2.2** Obtained only for specified, lawful purposes.

**3.2.3** Adequate, relevant, and not excessive in relation to the purpose for which it is processed.

**3.2.4** Accurate and, where necessary, kept up to date.

**3.2.5** Not kept for longer than is necessary for the purpose for which it is processed.

**3.2.6** Processed in line with the rights of the data subject.

**3.2.7** Secure and protected against unauthorized or unlawful processing and accidental loss, destruction, or damage.

**3.3** Patrolsec will ensure that all individuals are provided with information relating to data processing activities.

**3.4** To demonstrate compliance with these principles, Patrolsec maintains an internal data protection register.

#### **4. Data Subject's Rights**

**4.1** Individuals have rights to their personal data. Patrolsec will honour these rights and provide mechanisms to exercise them.

#### **5. Security**

**5.1** Patrolsec will implement and maintain appropriate technical and organizational measures to protect personal data. These measures will be proportionate to the potential harm that might be caused to the data subject, considering known risks.

#### **6. Breach Reporting**

**6.1** Patrolsec will report any personal data breach to the relevant authority and, when required, to the data subject, within the time frames set out in data protection legislation.

#### **7. Review and Update**

**7.1** This Data Protection Policy will be reviewed regularly and updated as necessary to reflect changes in our practices and to ensure compliance with any changes in data protection laws and regulations.

#### **8. Compliance**

**8.1** Compliance with data protection legislation is the responsibility of all Patrolsec employees, contractors, and stakeholders. Violation of this policy may result in disciplinary action.



This Data Protection Policy is approved by Patrolsec to ensure compliance with data protection legislation.

The Managing Director shall review this policy annually or following significant changes.

*M. Naeem*

Patrolsec Ltd.

Review date: 12/10/23