

## 1. Introduction

Autocraft Solutions Group collects and processes information about data subjects (i.e. 'personal data') for business purposes, including employment and Human Resources administration, provision of our services, marketing, and business administration. This includes personal data relating to our staff, customers, suppliers, shareholders, website users and other data subjects.

Compliance with data protection legislation is essential to ensure that personal data remains safe, our business operations are secure, and the rights of data subjects are respected. Autocraft Solutions Group is a controller under data protection legislation, meaning it decides how and why it uses personal data. This Policy explains our procedures for complying with data protection legislation in relation to personal data. It also sets out your obligations whenever you are processing any personal data in the course of your work for us.

Data protection legislation in the UK is regulated and enforced by the Information Commissioner's Office (ICO). Breaches of data protection legislation are serious offences and can include prosecution of the Company with extremely high fines, which can include a percentage of annual global turnover, and prosecution of data subjects. In addition, an individual may seek damages in the Courts if we breach their rights under data protection legislation.

There are also other policies which will impact on how you deal with and manage personal data and data protection. These include IT & Electronic Communications Policy, Social Media Policy, and CCTV Policy. You are expected to comply with these and any others where relevant.

This Policy does not give contractual rights to any individual and may be reviewed and updated at any time.

## 2. Scope

This Policy applies to all Autocraft Solutions Group employees, workers, contractors, agency workers, consultants, interns, volunteers, people on work experience and/or internship, partners and directors, (together referred to as 'you') and applies to all personal data processed by the Company.

**Note: In cases of work experience/internship where the person is designated a minor (ie, under the age of 18, a copy of our Privacy Notices will be given to the legal parent or guardian of the person).**

It is mandatory to comply with this and any other related policy and failure to comply may lead to disciplinary action for misconduct, with sanctions up to and including summary dismissal.

## 3. Aims

The aim of this policy is to provide a framework which ensures as far as practicably possible that personal data remains safe, our business operations are secure, and the rights of data subjects are respected thus meeting our obligations under data protection legislation.

## 4. Definitions

- **data protection legislation** – The UK legal framework, based on the EU General Data Protection Regulation that sets rules for the collection and processing of personal data about data subjects
- **personal data** - means any information relating to any living individual (also known as a 'data subject') who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number, employee number, email address, physical features). Relevant data subjects can include your colleagues, consumers, members of the public, business contacts, etc. Personal data can be factual (e.g. contact

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details or date of birth), an opinion about a person's actions or behaviour, or information that may otherwise impact on that individual. It can be personal, or business related.

Personal data protected by the data protection legislation may be held electronically (e.g. computer files or in emails) or in manual records which are part of a filing system or are intended to form part of a filing system (e.g. structured paper files and archives).

- **special category personal data and criminal convictions personal data** - Sensitive categories of personal data which need additional protection under the data protection legislation, such as personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life, or sexual orientation, biometric or genetic data, and personal data relating to criminal convictions and offences, including personal data relating to criminal allegations and proceedings.
- **processing personal data** - means any activity that involves the use of personal data (e.g. obtaining, recording, or holding/filing the data, amending, retrieving, using, disclosing, sharing, erasing, or destroying). It also includes sending or transferring personal data to third parties.
- **data controller** – A data controller decides the timing, purpose and manner to be followed to process the data. The companies that make up Autocraft Solutions Group are data controllers for the personnel data we process about our staff and that we use in our business for commercial purposes.
- **data processor** – Third parties that process data on behalf of a data controller.
- **data subject** – A person who can be identified either directly or indirectly from data.
- **data protection lead** – A person appointed to be responsible for overseeing and advising the Company on administering compliance with this policy and Data Protection legislation.
- **DPIA** – Data Protection Impact Assessment. A tool used for assessing data protection and privacy considerations.
- **ICO** – Information Commissioners Office. The UK regulatory body that oversees data protection and information rights.

## 5. Who is responsible for data protection at Autocraft?

The Board is ultimately responsible for Autocraft Solutions Group's compliance with applicable data protection legislation. The Group Human Resources Director is the appointed Data Protection Lead who is responsible for overseeing, advising Autocraft on and administering compliance with this Policy and data protection legislation. The Group Human Resources Director will enlist external expert support as necessary to fulfil this role.

At Autocraft Solutions Group we all have some responsibility for ensuring that personal data is kept secure and processed in a lawful manner although certain employees will have particular responsibilities, of which they will be aware and in respect of which they may receive specific instructions.

If you are in any doubt about how you should handle personal data, or if you have any concerns or questions in relation to the operation (or suspected breaches) of this Policy, you should seek advice from the Group Human Resources Director (Data Protection Lead).

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## 6. Data Protection Obligations

Autocraft Solutions Group is responsible for and must be able to demonstrate compliance with data protection legislation. To ensure that Autocraft Solutions Group meets its responsibilities, it is essential that you comply with data protection legislation and any other Group policies, guidelines or instructions relating to personal data when processing personal data when working for us.

We have set out below the key obligations under data protection legislation and details of how the Group expects you to comply with these requirements.

## 7. Process personal data in a fair, lawful and transparent manner

### Legal grounds for processing

Data protection legislation allows us to process personal data only where there are fair and legal grounds which justify using the information.

Examples of legal grounds for processing personal data include the following (at least one of these must be satisfied for each processing activity):

- complying with a legal obligation (e.g. health and safety or tax laws).
- entering into or performing a contract with a data subject (e.g. an employee's terms and conditions of employment, or a contract for services with an individual customer).
- acting in Autocraft Solutions Group or a third party's legitimate interests (e.g. maintaining records of business activities, monitoring business productivity).
- obtaining the consent of the individual (e.g. for sending direct marketing communications (other than those where there is legitimate interest to do so)).

Where consent is relied upon, it must be freely given, specific, informed, and unambiguous, and Autocraft must effectively demonstrate that consent has been given.

In line with ICO guidance regarding the employer/employee relationship, Autocraft Solutions Group does **not** use consent as a legal ground for processing employee data unless the data processing activities concerned are genuinely optional.

In most cases, consent is also not required for other standard business activities involving use of customer or supplier data, but it may be needed for activities which are not required to manage the main business relationship, such as direct marketing activities (other than those where there is legitimate interest to do so).

### Transparency

Data protection legislation also requires us to process personal data in a transparent manner by providing data subjects with appropriate, clear, and concise information about how we process their personal data.

We provide data subjects with basic information about how we use their data on forms which collect data (such as application forms or website forms), and in longer privacy notices setting out details including: the types of personal data that we hold about them, how we use it, our legal grounds for processing the information, who we might share it with and how long we keep it for. For example, we provide information about our processing of employees' personal data in the Autocraft Solutions Group Employee Privacy Notice.

We supplement these notices, where appropriate, with reminders or additional information at the time particular processing activities take place or become relevant for an individual (for example when they sign up for a new service or event).

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**What you need to do:**

By processing personal data only in accordance with your work for us and Company instructions, ordinarily, you will be processing personal data fairly and lawfully.

The standard privacy notices and statements that we issue, for example, to employees, customers, and the public, should normally be sufficient to ensure that data subjects have appropriate information about how you are handling their personal data in the course of your work for us.

You should consider whether reminders or additional information may be appropriate at the time particular processing activities take place. This is particularly important if you think that data subjects may need further assistance to understand clearly how their data will be used as part of such activities. If this is the case seek guidance from the Group Human Resources Director (Data Protection Lead) before you take any steps.

Any new forms which collect personal data, and any proposed consent wording must be approved in advance by the Group Human Resources Director (Data Protection Lead).

If you have any concerns about the legal grounds for processing personal data, or if you are unsure whether data subjects have been provided with appropriate information (in particular in relation to any new processing activities), please check with the Group Human Resources Director (Data Protection Lead).

**8. Take extra care when handling sensitive personal data.**

Some categories of personal data are particularly sensitive. These include information that reveals details of an individual's:

- racial or ethnic origin.
- political opinions.
- religious or philosophical beliefs.
- trade union membership.
- physical or mental health.
- sexual life or sexual orientation.
- biometric or genetic data (if used to identify that individual).
- criminal offences or convictions.

Where special category personal data or criminal convictions personal data is concerned, data protection legislation requires Autocraft Solutions Group to have (as well as one of the legal grounds described in section 1), an additional legal ground to justify using this sensitive information. The appropriate legal ground will depend on the circumstances.

Additional legal grounds for processing this type of sensitive personal data include the following. Those marked with an asterisk (\*) would be particularly relevant to processing employees' special category personal data:

- complying with a legal obligation/exercising a legal right in the field of employment.\*
- assessing working capacity (based on expert medical opinion, and subject to obligations of confidentiality).\*
- carrying out equalities monitoring in relation to racial or ethnic origin, religious beliefs, health or sexual orientation.\*
- exercising, establishing or defending legal claims.\*
- preventing or detecting unlawful acts.

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- explicit consent of the individual. (As well as the requirements for consent outlined in section 1 above, this requires an express statement from the individual that their special category of data may be used for the intended purposes.)

**What you need to do:**

If you are handling special category personal data or criminal convictions personal data in the course of your work with us, you need to take extra care regarding compliance with data protection law. If you are routinely handling special category personal data or criminal convictions personal data as part of the requirements of your work for us in accordance with our instructions, Autocraft Solutions Group will ordinarily have put in place procedures which ensure that your processing activities satisfy the requirements above.

For example:

- appropriate legal grounds for processing the data.
- data subjects have received adequate information regarding how their data is being handled. In some cases, an existing privacy notice may need to be supplemented with more specific information regarding special category personal data.
- we apply additional security and confidentiality measures, taking into account that the impact on data subjects' of loss or misuse of their special category personal data or criminal convictions data may be greater than with other types of data.

If you have any concerns over the legal grounds that apply when you are processing special category personal data or criminal convictions personal data or the appropriate information to be provided to data subjects, please get in touch with the Group Human Resources Director (Data Protection Lead).

If alternative circumstances apply (e.g. you are involved in a new project or updating an existing system which involves new types of processing of special category personal data or criminal convictions data), please contact the Group Human Resources Director (Data Protection Lead) to ensure that the correct compliance procedures are followed.

**9. Only process personal data for specified, explicit and legitimate purposes.**

Autocraft Solutions Group will only process personal data in accordance with our legitimate purposes to carry out our business operations and to administer employment and other business relationships.

**What you need to do:**

You must only use the personal data that you process in the course of your duties for Autocraft Solutions Group's legitimate and authorised purposes. You must not process personal data for any purposes which are unrelated to your work with us.

Processing personal data for any incompatible or unauthorised purposes could result in a breach of data protection legislation (e.g. using the company contacts database to find out a colleague's home address for private, non-work-related purposes). This may have potentially damaging consequences for all parties concerned, including disciplinary action and potential criminal prosecution.

If you find that you need to process personal data for a different purpose from that for which it was originally collected, you must check whether the data subjects have been informed and, if not, consider whether the additional purpose is legitimate (in the context of Autocraft Solutions Group's business activities) and compatible with the original purpose.

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If you are unsure about whether the purposes for processing are legitimate, you should contact the Group Human Resources Director (Data Protection Lead) before going ahead with processing the data for the additional purpose.

**10. Make sure that personal data is adequate, relevant, and limited to what is necessary for your legitimate purposes.**

Data protection legislation requires us to ensure that when we process personal data, it is adequate, relevant to our purposes and limited to what is necessary for those purposes (also known as 'data minimisation'). In other words, we ask for the information we need for our business purposes, but we will not ask for more information than we need in order to carry out our business operations.

***What you need to do:***

You should try to ensure that you only acquire and process the personal data that you actually need for Autocraft Solutions Group's legitimate and authorised purposes within the scope of your role.

You must ensure that you have sufficient personal data needed to be able to use it fairly and to take into account all relevant details.

If you are creating forms that collect personal data, you should be able to justify why each specific category of data is being requested.

You must also comply with Autocraft Solutions Group's procedures relating to data retention and storage, ensuring that personal data is only kept for as long as it is needed for any intended purpose.

**11. Keep personal data accurate, and where necessary up to date.**

Autocraft Solutions Group must take steps to ensure that personal data is accurate and (where necessary) kept up to date. For example, we request that employees provide us with any change in contact details or personal information via Form 4168. We also take care that decisions impacting data subjects are based on accurate and up to date information.

***What you need to do:***

When you process data subjects' personal data in the course of your work with us, you must be accurate and, where necessary, keep the relevant information updated.

When collecting any personal data, try to confirm its accuracy at the outset. If you subsequently discover any inaccuracies in the personal data that you are handling, these need to be corrected or deleted without delay.

Personal data should be held in as few places as possible to avoid the risk of duplicated copies and to ensure that only the 'master' copies are used for updating purposes. You should not create additional copies of personal data but should work from and update a single central copy where possible (in accordance with standard Autocraft Solutions Group procedures on retention and storage of records).

**12. Keep personal data for no longer than is necessary for the identified purposes.**

Records containing personal data should only be kept for as long as they are needed for the identified purposes. Autocraft Solutions Group has in place data retention, storage and deletion policies and internal processes/guidelines regarding various types of company records and information that contain personal data.

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We take appropriate steps to retain personal data only for so long as is necessary, taking into account the following criteria:

- the amount, nature, and sensitivity of the personal data.
- the risk of harm from unauthorised use or disclosure.
- the purposes for which we process the personal data and how long we need the particular data to achieve these purposes.
- how long the personal data is likely to remain accurate and up to date.
- for how long the personal data might be relevant to possible future legal claims.
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept.

***What you need to do:***

Please familiarise yourself with our retention policies, processes, guidelines, and instructions that are relevant to your work. Ensure that, where it falls within your responsibility, you securely destroy or erase all information that you no longer require in accordance with the policies and guidelines.

If you are not sure what retention guidelines/instructions apply to you in your role, or you are unsure of how to apply them to a particular type or item of personal data, please contact the Group Human Resources Director (Data Protection Lead).

**13. Take appropriate steps to keep personal data secure.**

Keeping personal data safe and complying with Autocraft Solutions Group’s security procedures to protect the confidentiality, integrity, availability, and resilience of personal data is a key responsibility for the Group and its workforce.

Autocraft Solutions Group has an IT & Electronic Communications Policy and Social Media Policy which sets out its organisational and technical security measures to protect information, including personal data. Also we have the following organisational controls: e.g. locked filing cabinets, building security, information subject to access controls and passwords, reliability checks on/confidentiality obligations of employees, encryption of hardware or software, pseudonymisation, anti-virus and network protection, software updates, security testing and incident management, secure disposal of records and equipment, backup and disaster recovery, remote working procedures, protocols on use of technology and data storage, asset registers.

We regularly evaluate and test the effectiveness of these measures to ensure the security of our personal data processing activities as set out in our IT & Electronic Communications Policy.

***What you need to do:***

To assist Autocraft Solutions Group in maintaining data security and protecting the confidentiality and integrity of the personal data you handle in the course of your work with us, we require you to comply with this Policy, our IT & Electronic Communications Policy, our Social Media Policy and any Autocraft instructions regarding the processing and security of personal data as stated below:

- save, store, and communicate personal data only within or using authorised Autocraft information and communications systems. Do not store personal data on personal devices or using personal communications facilities.

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- use password-protected and encrypted software for the transmission and receipt of emails.
- lock files in secure filing cabinets.
- never leave your laptop, other device, or any hard copies of documents containing personal data in a public place, especially if you are viewing the personal data in a public place.
- when storing data on portable devices such as laptops, smartphones, or USB drives, ensure that the device is encrypted, and password protected.
- ensure that information containing personal data is disposed of securely and permanently, using confidential waste disposal or shredding.
- alert the Group Human Resources Director (Data Protection Lead) to any personal data breaches immediately.
- ensure that any sharing or disclosure of personal data is permitted on appropriate legal grounds and, where necessary, safeguards are in place if sharing data internationally, or if sharing personal data with third party service providers.

#### 14. Take extra care when sharing or disclosing personal data.

The sharing or disclosure of personal data is a type of processing, and therefore all the principles described in this Policy need to be applied.

##### Internal data sharing

Autocraft Solutions Group ensures that personal data is only shared internally on a ‘need to know’ basis.

##### External data sharing

We will only share personal data with other third parties (including other Group entities) where we have a legitimate purpose, and an appropriate legal ground under data protection legislation which permits us to do so. Commonly, this could include situations where we are legally obliged to provide the information (e.g. to HMRC for tax purposes) or where necessary to perform our contractual duties to data subjects (e.g. provision of information to our occupational pension providers).

We may appoint third party service providers (known as data processors) who will handle information on our behalf, for example to provide payroll, data storage or other technology services.

Autocraft Solutions Group remains responsible for ensuring that its data processors comply with data protection legislation and this Policy in their handling of personal data. We must assess and apply data protection and information security measures prior to and during the appointment of a processor. The extent of these measures will vary depending on the nature of the activities, but will include appropriate risk assessments and reviews, and contractual obligations.

Details of the recipients or categories of recipients of personal data (including processors and other third parties) should be set out in privacy notices as described in section 1 above.

##### **What you need to do:**

You may only share or disclose the personal data we hold internally with an employee, agent, or representative of Autocraft if the recipient has a job-related need to know the information.

You may only disclose the personal data we hold to service providers or other third parties (including group entities)

Routine disclosures of personal data to established recipients (e.g. payroll providers or group entities) which form a normal and regular part of your role and job duties will ordinarily satisfy the above requirements. You should always ensure you comply with any particular Autocraft Solutions Group instructions you are given. However, if you are in

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any doubt as to whether you can share personal data with anyone else, first contact the Group Human Resources Director (Data Protection Lead).

## 15. Transfer of personal data to another country.

An overseas transfer of personal data takes place when the data is transmitted or sent to, viewed, accessed, or otherwise processed in a country outside the UK. The data protection legislation restricts overseas transfers, to ensure that the level of data protection afforded to data subjects is not compromised, as the laws of such countries may not provide the same level of protection for personal data as the UK.

To ensure that data protection is not compromised when personal data is transferred to another country, Autocraft Solutions Group assesses whether there is a determination by the ICO that there are adequate safeguards in place (as is currently the case with, for example, with the European Union plus Norway, Liechtenstein and Iceland and with the Republic of Korea) or whether other appropriate safeguards as set out by the ICO should be put in place. Appropriate safeguards can include:

- Specific contractual terms
- An approved code of conduct
- A certification mechanism

No transfer of personal data outside the UK should take place before this has been assessed by the Group Human Resources Director (Data Protection Lead).

### ***What you need to do:***

If you are required to transfer data subjects' personal data outside of the UK in the course of your work with us, adequate safeguards will need to be in place. Where these overseas transfers are a normal part of your role and job duties, Autocraft Solutions Group's current safeguards are likely to provide the required levels of data protection.

However, if you are going to be transferring personal data overseas in alternative circumstances (e.g. for new types of processing activities which haven't previously formed part of your job scope and activities, or to countries with which you haven't previously dealt) you should contact Group Human Resources Director (Data Protection Lead) for further guidance before going ahead with the transfer.

## 16. Report any data protection breaches without delay.

Autocraft Solutions Group takes any data protection breaches very seriously. These can include lost or mislaid equipment or data, use of inaccurate or excessive data, failure to address an individual's rights, accidental sending of data to the wrong person, unauthorised access to, use of or disclosure of data, deliberate attacks on the Group's systems or theft of records, and any equivalent breaches by the Group's service providers.

Where there has been a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to data subjects' personal data, Autocraft Solutions Group will take immediate steps to identify, assess and address it, including containing the risks, remedying the breach, and notifying appropriate parties (see below). Autocraft Solutions Group has a Breach Management Procedure which sets out its procedures for identifying, assessing, and addressing security breaches.

If Autocraft Solutions Group discovers that there has been a personal data security breach that poses a risk to the rights and freedoms of data subjects, we will report it to the ICO within ICO timeframes (currently within 72 hours of discovery).

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We also keep an internal record of all personal data breaches regardless of their effect and whether or not we report them to the ICO.

If a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, we will tell affected data subjects that there has been a breach and provide them with information about its likely consequences and the mitigation measures we have taken.

***What you need to do:***

If you become aware of any breach, or suspected breach, of this Policy (including, in particular any security breach), you must report it to the Group Human Resources Director (Data Protection Lead) immediately, no matter what the time of day or the day of the week, to ensure that the breach is effectively assessed and addressed, and that we comply with Autocraft Solutions Group data breach reporting obligations.

**17. No automated decision-making.**

Profiling, or automated decision-making, occurs where an individual's personal data is processed and evaluated by an automated means resulting in an important decision being taken in relation to that individual. This poses particular risks for data subjects where a decision is based solely on that profiling or other automated processing.

Autocraft Solutions Group does not carry out any solely automated decision-making.

**18. Integrate data protection into operations.**

Data protection legislation requires Autocraft Solutions Group to build data protection considerations and security measures into all of our operations that involve the processing of personal data, particularly at the start of a new project or activity which may impact on the privacy of data subjects. This involves taking into account various factors including:

- the risks (and their likelihood and severity) posed by the processing for the rights and freedoms of data subjects.
- technological capabilities.
- the cost of implementation.
- the nature, scope, context, and purposes of the processing of personal data.

We also seek to assess data protection risks regularly throughout the lifecycle of any project or activity which involves the use of personal data.

***What you need to do:***

If you are involved in the design or implementation of a new project or activity that involves processing personal data, you must give due consideration to all the principles of data protection set out in this policy.

You should assist the Data Protection Lead with regular reviews of projects or activities to ensure data protection risks continue to be addressed.

A useful tool for assessing data protection and privacy considerations is a Data Protection Impact Assessment or 'DPIA'. A DPIA will consider the necessity and proportionality of a processing operation and assess the risks to data subjects and the measures that can be put in place to mitigate those risks. A DPIA must be carried out if a data processing operation is likely to give rise to a high risk to individual rights and freedoms.

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If you are involved in the design or implementation of a new project that involves processing personal data, you must check whether it is necessary to conduct a DPIA or similar risk or compliance assessment by contacting the Group Human Resources Director (Data Protection Lead) before implementing the project. They will also be able to advise you on how we expect you to conduct, or otherwise contribute to, a DPIA or similar risk assessment.

## 19. Data Subject Rights and Requests

Under data protection legislation data subjects have certain rights when it comes to how we handle their personal data. For example, a data subject has the following rights:

- **The right to make a ‘Data Subject Access Request’ (DSAR).** This entitles an individual to receive a copy of the personal data we hold about them, together with information about how and why we process it and other rights which they have as outlined below.
- **The right to request that we correct incomplete or inaccurate** personal data that we hold about them.
- **The right to withdraw any consent** which they have given.
- **The right to request that we delete or remove** personal data that we hold about them where there is no good reason for us continuing to process it. Data subjects also have the right to ask us to delete or remove their personal data where they have exercised their right to object to processing (see below).
- **The right to object to our processing** of their personal data for direct marketing purposes, or where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- **The right to request that we restrict our processing** of their personal data. This enables data subjects to ask us to suspend the processing of personal data about them, for example if they want us to establish its accuracy or the reason for processing it.
- **The right to request that we transfer** to them or another party, in a structured format, their personal data which they have provided to us (also known as the right to ‘data portability’). The applicability of this right is limited to certain circumstances.
- **The right to challenge a decision** based solely on profiling/automated processing, to obtain human intervention, and to express their point of view.

We are required to comply with these rights without undue delay and within a one-month timeframe.

Data subjects also have the right to complain to the ICO and to take action in Court to enforce their rights and seek compensation for damage suffered from any breaches.

### ***What you need to do:***

If you receive a request from an individual seeking to exercise a right in relation to their personal data, or making an enquiry or complaint about our use of their personal data, you must forward the request, enquiry or complaint to the Group Human Resources Director (Data Protection Lead) immediately so that it can be dealt with appropriately and within the applicable time limit in accordance with Autocraft Solutions Group’s individual personal data rights procedures. Your assistance may be needed to address and respond to the request, enquiry, or complaint.

## 20. Record Keeping

In order to comply and to demonstrate our compliance with data protection legislation, Autocraft Solutions Group keeps various records of our data processing activities. These include a Record of Processing which must contain, as a minimum: the purposes of processing, categories of data subjects and personal data, categories of recipients of disclosures of data, information about international data transfers, envisaged retention periods, general descriptions of security measures applied, and certain additional details for special category data.

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## **What you need to do:**

You must also comply with our applicable processes/guidelines and any specific instructions you are given concerning the keeping of records about our processing of personal data.

If you are processing data subjects' personal data in the course of your work with us and you collect any new types of personal data or undertake any new types of processing activities, either through the introduction of new systems or technology, or by amending existing ones, please inform the Group Human Resources Director (Data Protection Lead) before you do so, so that we are able to keep our records up to date.

## **21. Training**

We require all employees to undergo some basic training to enable them to comply with data protection law and this policy. Additional training may be required for specific roles and activities involving the use of personal data.

To this end, we provide training as appropriate as part of our induction process for new joiners to Autocraft Solutions Group and where appropriate operate an ongoing training program to make sure that employees' knowledge and understanding of what is necessary for compliance in the context of their role is up to date. Attendance at such training is mandatory and will be recorded. If you routinely handle data subjects' personal data, you will be given specific training/instructions regarding data protection procedures in relation to your particular role/department. These training/instructions will supplement your obligations as set out in this Policy.

## **22. Departures from this Policy**

There are some very limited exemptions from data protection legislation, which may permit departure from aspects of this Policy in certain circumstances.

You will be given specific instructions if any exemptions are relevant to your role.

If you think you should be able to depart from this Policy in any circumstances, you must contact the Group Human Resources Director (Data Protection Lead) before taking any action.

## **23. Compliance**

Any breach of this policy will be subject to investigation and proven allegations will be subject to disciplinary sanction up to and including summary dismissal. As breaches of this policy may also constitute a criminal offence, disclosure may also be made to the relevant legal bodies as appropriate.

### Document History

Rev	Section	Revision Detail	Author	Approver	Issue Date
1	All	New issue.	M.Percival	S.Harris	24.05.2018
2	All	Rebranding to Autocraft Solutions Group	L.Paukina	M.Percival	26.06.2018
3	All	Major Update	T Pugh	B Barr	22 August 2024

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