

Document Name	DATA PROTECTION POLICY
Document Reference Number	DOW-POL-04-DATA PROTECTION
Date of last review	23/10/2023
Date due for review	23/10/2024
Person responsible for update	DIRECTOR
Version Number	02



## DATA PROTECTION POLICY

Dowlas Property Group is committed to the protection and security of personally identifiable information. Dowlas is working in compliance with BS 10012:2017 which is a specification for the development and maintenance of a Personal Information Management System (PIMS).

Whilst identifying and understanding that we operate in a world where data security is becoming increasingly integral, the PIMS has been established to minimise the likelihood and impact of any incidents relating to the compromise of personally identifiable information.

The policy's goal is to ensure that the processing of personal information only takes place where it is strictly necessary for legal, regulatory or legitimate operational purposes. Dowlas does not collect information relating to or directly from children.

Below is framework that has been determined for setting objectives in order to ensure data protection is considered in everything we do and that we continually aim to enhance our PIMS:

1. Dowlas processes the minimum amount of personally identifiable information (PII) required for the purposes of collection;
2. Dowlas provide individuals with clear information regarding how their PII is used and by whom through the relevant Privacy Policy;
3. All PII processed is done in a fair and lawful manner;
4. We have an up-to-date documented inventory detailing the categories of PII processed by our organisation;
5. We shall only retain personal information for as long as is necessary and shall ensure that secure disposal methods are used once the retention periods are met;
6. We respect individual's rights in relation to their PII and keep it secure;
7. We only transfer PII outside of the UK in circumstances where it is adequately protected and where PII leaves the EEA, we have taken measures to ensure that suitable security measures are in place;

The Director is responsible for maintaining this policy and providing support and advise during its implementation. All managerial roles are directly responsible for implementing the policy and ensuring staff compliance with respective departments. Compliance with this policy is mandatory.

Signature:

A handwritten signature in black ink, appearing to be "M. J. [unclear]", written over a light blue horizontal line.

Date: 23<sup>rd</sup> October 2023

Title: Managing Director