GDPR Policy

Purpose

The purpose of this policy is to ensure that NWF Facilities Ltd complies with the General Data Protection Regulation (GDPR) and other relevant data protection legislation. This policy outlines how we protect personal data, ensure data privacy, and uphold the rights of data subjects.

Scope

This policy applies to all employees, contractors, consultants, temporary staff, and other workers at NWF Facilities Ltd who handle personal data. It covers all personal data processed by NWF Facilities Ltd, including data relating to employees, clients, suppliers, and other stakeholders.

Policy Statement

NWF Facilities Ltd is committed to safeguarding personal data and respecting the privacy rights of individuals. We will process personal data lawfully, fairly, and transparently, ensuring the security and confidentiality of the data.

Definitions

Personal Data: Any information relating to an identified or identifiable natural person.

Data Subject: An individual whose personal data is processed by NWF Facilities Ltd.

Processing: Any operation performed on personal data, including collection, storage, use, and deletion.

Data Controller: The entity that determines the purposes and means of processing personal data.

Data Processor: The entity that processes personal data on behalf of the data controller.

Data Protection Officer (DPO): The individual responsible for overseeing the company’s data protection strategy and implementation.

Data Protection Principles

NWF Facilities Ltd will adhere to the following data protection principles:

Lawfulness, Fairness, and Transparency

Personal data will be processed lawfully, fairly, and in a transparent manner in relation to the data subject.

Purpose Limitation

Personal data will be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.

Data Minimization

Personal data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

Accuracy

Personal data will be accurate and, where necessary, kept up to date. Inaccurate data will be erased or rectified without delay.

Storage Limitation

Personal data will be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed.

Integrity and Confidentiality

Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.

Accountability

NWF Facilities Ltd will be responsible for and be able to demonstrate compliance with these principles.

Rights of Data Subjects

Data subjects have the following rights:

Right to be Informed: About the collection and use of their personal data.

Right of Access: To their personal data and supplementary information.

Right to Rectification: To have inaccurate personal data rectified or completed if it is incomplete.

Right to Erasure: To have personal data erased under certain conditions.

Right to Restrict Processing: To request the restriction or suppression of their personal data.

Right to Data Portability: To obtain and reuse their personal data for their own purposes across different services.

Right to Object: To the processing of their personal data in certain circumstances.

Rights related to Automated Decision Making and Profiling To not be subject to a decision based solely on automated processing, including profiling.

Data Security

NWF Facilities Ltd will implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

Encryption of personal data.

Regular testing, assessment, and evaluation of the effectiveness of technical and organizational measures for ensuring data security.

Access control measures to restrict access to personal data to authorized personnel only.

Procedures to identify and respond to data breaches promptly.

Data Breach Notification

In the event of a data breach, NWF Facilities Ltd will notify the relevant supervisory authority within 72 hours of becoming aware of the breach, unless the breach is unlikely to result in a risk to the rights and freedoms of individuals. If the breach is likely to result in a high risk to the rights and freedoms of individuals, NWF Facilities Ltd will also notify the affected data subjects without undue delay.

Third-Party Processors

NWF Facilities Ltd will ensure that any third parties that process personal data on our behalf do so in a manner consistent with this policy and comply with GDPR requirements. We will enter into data processing agreements with all third-party processors.

Training and Awareness

All employees and others working on behalf of NWF Facilities Ltd will receive training on data protection and GDPR compliance. Regular updates and refresher training will be provided as necessary.

Monitoring and Review

This policy will be reviewed annually by the Data Protection Officer and updated as necessary to ensure continued compliance with GDPR and other relevant legislation.

Signed on behalf of:

Date: 01/02/2025