



PENDRAGON DATA PROTECTION POLICY STATEMENT

1 INTRODUCTION

The company collects, stores and processes the personal data of our customers, potential customers, suppliers, team members and other third parties during the course of our activities. The company understands the benefits of holding personal data in respect of such individuals, but also recognises that such individuals are entitled to expect that the company deals with his/her personal data in the correct and lawful manner, and in accordance with the relevant Data Protection legislation.

Therefore, to ensure that we comply with the rights of the individual we abide by this policy and as a result we avoid the risk of:-

- Damage to our reputation;
- Civil action by the individual;
- Criminal prosecution or regulatory sanction.

2 PERSONAL DATA

2.1 When processing an individual's personal data (including organising, retrieving, using and disclosing personal data) we:-

- Deal with the data fairly and lawfully;
- Only deal with the data for specified and lawful purposes and in an appropriate way;
- Only hold data which is adequate, relevant and not excessive for the purpose;
- Keep the data accurate and up to date;
- Keep the data no longer than is necessary for the purposes which the individual has been made aware of
- Process the data consistently with the individual's rights (see below);
- Keep the data secure;
- Do not transfer the data to people or organisations situated in countries without adequate protection.

2.2 When processing an individual's personal data we also ensure that one of the following applies:-

- The individual has given their consent to the processing;
- The processing is necessary for the performance of a contract to which the individual is a party or for taking steps with a view to entering into a contract;
- The processing is pursuant to a legal obligation;
- The processing is necessary for the protection of the individual's vital interests;
- The processing is necessary for administration of justice/statutory or government function/other public function.

3 SENSITIVE PERSONAL DATA

- 3.1 If the data being processed is sensitive (that is data concerning racial or ethnic origin, political opinions, religious or similar beliefs, membership of trade unions, physical or mental health, sexual orientation, commission or alleged commission of offences and details of legal proceedings) we also ensure one of the following applies:-
- The individual has given their explicit consent;
 - An employment right/obligation is relevant;
 - It is processing data of a racial or ethnic origin needed to monitor equal opportunity;
 - It is necessary for legal proceedings/advice;
 - It is necessary for the protection of the individual's vital interest where consent is not obtainable;
 - It is necessary for the administration of justice/statutory or government function/other public function.
- 3.2 We at all times abide by an individual's right to:-
- A copy of any data being processed – in an intelligible form;
 - Know what data is being processed;
 - Know to whom the data may be disclosed;
 - Know who is processing the data;
 - Prevent processing likely to cause damage or distress;
 - Prevent processing for direct marketing;
 - Know why the data is being processed;
 - Know the source of the data (minus exceptions);
 - Enforce rectification, blocking, erasure, and destruction of inaccurate data;
 - Be informed when the data is first processed or when the data is first disclosed to a third party where the individual has not provided the data themselves (unless to do so would entail a disproportionate effort).
- 3.3 Certain rights of the individual are subject to the payment of an appropriate fee.