

## **LEG-05 Data Protection and GDPR Policy (v1.0)**

### **1. Purpose**

This policy outlines how Blackoak Contracts collects, processes, stores, and protects personal data in compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. It ensures that all personal data is handled lawfully, transparently, and securely.

### **2. Scope**

This policy applies to all employees, subcontractors, and third parties who process or handle personal data on behalf of Blackoak Contracts, including clients, suppliers, and employees' data.

### **3. Definitions**

- **Personal Data:** Any information relating to an identified or identifiable natural person (data subject).
- **Processing:** Any operation performed on personal data, such as collection, storage, use, or deletion.
- **Data Subject:** An individual whose personal data is being processed.
- **Data Controller:** The entity determining how and why personal data is processed (Blackoak Contracts).
- **Data Processor:** Any person or organisation processing personal data on behalf of the controller.

### **4. Policy Statement**

Blackoak Contracts commits to:

- Comply with all relevant data protection laws.
- Collect and process personal data fairly and lawfully.
- Use data only for specified, legitimate purposes.
- Keep personal data accurate, up to date, and secure.
- Retain personal data only as long as necessary.
- Respect individuals' rights regarding their personal data.
- Ensure appropriate technical and organisational measures protect data.



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- Provide training to employees and subcontractors on GDPR compliance.

## **5. Lawful Basis for Processing**

Personal data will be processed only when there is a lawful basis, such as:

- Consent from the data subject.
- Performance of a contract.
- Compliance with legal obligations.
- Protection of vital interests.
- Legitimate interests pursued by Blackoak Contracts.

## **6. Data Collection**

- Data will be collected directly from data subjects wherever possible.
- Data collection will be limited to what is necessary.
- Data subjects will be informed about the purpose of collection.

## **7. Data Usage**

- Personal data will be used solely for the purposes for which it was collected.
- Sharing data with third parties will be limited to those who need it and only with appropriate safeguards.

## **8. Data Security**

Blackoak Contracts will implement appropriate security measures to:

- Protect data against unauthorized or unlawful processing.
- Prevent accidental loss, destruction, or damage.
- Restrict access to personal data to authorized personnel only.
- Ensure secure transfer of data when required.

## **9. Data Retention**

Personal data will be retained only as long as necessary to fulfill its purpose or comply with legal requirements. Retention periods will be defined in accordance with business needs and statutory obligations.



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## **10. Data Subject Rights**

Blackoak Contracts respects and facilitates data subject rights, including:

- Right of access to their personal data.
- Right to rectification of inaccurate data.
- Right to erasure (“right to be forgotten”).
- Right to restrict processing.
- Right to data portability.
- Right to object to processing.
- Rights related to automated decision-making and profiling.

Requests regarding these rights should be directed to the Data Protection Officer or designated contact.

## **11. Breach Notification**

In the event of a data breach, Blackoak Contracts will:

- Assess the breach promptly.
- Notify the Information Commissioner’s Office (ICO) within 72 hours if required.
- Inform affected data subjects if there is a high risk to their rights and freedoms.
- Take immediate action to mitigate and rectify the breach.

## **12. Roles and Responsibilities**

### **12.1. Managing Director**

- Overall responsibility for GDPR compliance.
- Ensures resources and support for data protection.

### **12.2. Data Protection Officer (DPO) / Designated Person**

- Oversees day-to-day data protection matters.
- Acts as point of contact for data subjects and regulators.
- Conducts training and audits.

### **12.3. Employees and Subcontractors**

- Must comply with this policy.
- Report data breaches or concerns immediately.



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### **13. Training**

All relevant personnel will receive GDPR and data protection training at induction and regular intervals thereafter.

### **14. Policy Review**

This policy will be reviewed annually or in response to legal or operational changes.

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