Ashford Business Services Ltd

Data Protection Policy

How the organisation handles personal data, the rights of data subjects, and what happens if personal data is lost or shared without permission. General wording only, not legal advice. Check it fits your situation and seek professional advice before relying on it; adapt every bracketed item to your organisation. Organisation: Sarah Mitchell | Policy owner: James Patel, Office Manager | Data protection lead: Sarah Mitchell | Effective: 9 November 2026 | Review: 9 November 2027 | Version: Version number

1. Purpose, scope, law and roles

This policy sets out how Sarah Mitchell handles personal data, meaning information about an identifiable person, such as a name, address, contact details or an identification number. It applies to all personal data held by Sarah Mitchell, in any format, and to all staff who handle personal data, including employees, temporary staff, contractors and volunteers. The law that applies to Sarah Mitchell is Sarah Mitchell, and the person responsible for data protection is Sarah Mitchell. Where that law sets a stricter rule than this policy, the law prevails.

Office Manager: has overall responsibility for this policy and for how personal data is handled. **Sarah Mitchell:** advises on this policy, handles requests from data subjects, leads the breach response, and keeps the record of how personal data is used. **Managers:** make sure their team follows this policy and report any problem to the data protection lead. **All staff:** handle personal data only as this policy allows, keep it secure, and report any problem promptly.

2. Principles for handling personal data

Handle personal data in line with these principles: **1.** Collect and use it only for a clear, recorded purpose, and not for a different purpose without a lawful basis under Sarah Mitchell. **2.** Collect only the data needed for that purpose, and no more. **3.** Keep it accurate and up to date, and correct or delete it promptly where it is wrong. **4.** Keep it only as long as needed, as set out in the Document Retention Schedule, then dispose of it securely. **5.** Keep it secure, using the measures in section 4 and in the Confidentiality Policy. **6.** Be open about how it is used, telling the people the data is about the purpose, how long it will be kept, and who it may be shared with. **7.** Do not transfer it outside Sarah Mitchell unless the law allows it and the transfer has been approved by the data protection lead.

3. Rights and requests

A data subject is a person whose personal data is held by Sarah Mitchell, with rights under Sarah Mitchell: **Access:** ask what personal data is held about them and receive a copy within Number of days days. **Correction:** ask for wrong data to be corrected promptly and be told when done. **Deletion:** ask for data to be deleted where the law allows it, checked against the retention schedule, and be told the outcome. **Restriction:** ask for use of data to be limited while a question about it is checked. **Objection:** object to a use of data where the law allows it; the objection is recorded and the use reviewed.

A request may be made in writing to sarah.mitchell@ashford-business-services.co.uk or in person to the data protection lead. Check identity before sharing any personal data, using Method used to check identity, for example, a form of identification. Record each request with the date received, what was asked for, and the date answered. If a request is refused in whole or in part, tell the person why and how to complain or ask for a review, as the law requires. No fee is charged unless the law allows a fee for a request that is repeated or excessive, in which case the fee is £45.00.

4. Breach response, retention, training and review

A personal data breach is any loss, sharing of, or access to personal data without permission, including a lost device, data sent to the wrong person, or unauthorised access to a system. **1.** Report it to the data protection lead as soon as possible and no later than Number of hours hour(s) after you become aware of it. Do not hide a breach and do not delete anything that may help to understand what happened. **2.** The data protection lead will record the breach and assess the data and people affected and how serious it is. **3.** Where the breach is likely to cause harm, tell the people affected promptly, in clear language, what has been done and what they can do. **4.** Where the law requires a report to Sarah Mitchell, make it within the time the law requires. **5.** Afterwards, record what was learned and what will change, so it does not happen again.

Keep personal data only as long as needed, as set out in the Document Retention Schedule, then dispose of it securely, shredding paper and verifiably deleting electronic records. Do not keep personal data in personal email, on personal devices, or in personal cloud storage unless the data protection lead has approved it in writing. All staff who handle personal data must be trained on this policy when they join Sarah Mitchell and at least How often training is repeated, for example, once a year after that; training is arranged by Office Manager and attendance recorded by Office Manager. This policy is reviewed at least How often this policy is reviewed, for example, once a year, and whenever the applicable law changes or the way personal data is handled changes. The review is carried out by the data protection lead and approved by Office Manager.

Approved: Office Manager, Helen Morris, 9 November 2026 | Office Manager, Helen Morris, 9 November 2026