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1. Data Protection Principles

Barcham Trees Plc is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. Processed lawfully, fairly and in a transparent manner in relation to individuals.
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- e. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data will be processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, using appropriate technical or organisational measures.”

2. General Provisions

- a. This policy applies to all personal data processed by Barcham Trees PLC.
- b. The Sales Director (Data Protection Officer) shall take responsibility for the Business's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Business does not need to register with the Information Commissioner's office as an organisation that processes personal data as this information is only used for the core business functions.

3. Lawful, Fair & Transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Barcham Trees Plc shall maintain a Register of Systems used to store data.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data, and any such requests made to the Business shall be dealt with and responded to in writing within 30 working days (on provision of appropriate identification).

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4. Lawful Purposes.

- a. All data processed by Barcham Tress Plc must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. The Business shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent the option for the individual to revoke their consent is clearly available and systems are in place to ensure such revocation is reflected accurately in the Business's system, this is controlled by the Barcham Trees DPO.

5. Data Minimisation

- a. The Business will ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This is covered off in our internal procedures for data handling.
- b. The Business only uses data required for Core Business Functions and does not use any of the data for additional marketing to any outside party.

6. Accuracy

- a. The Business takes reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful Basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. Any Data subject can make a request for the data the business holds on them at any time and if this is found to be incorrect then the Business will either update the relevant records or delete from its systems.

7. Archiving/Removal

- a. To ensure that personal data is kept for no longer than necessary, the Business has put in place an archiving policy for each area in which personal data is processed and this is reviewed annually.
- b. The archiving policy considers what data should/must be retained, for how long, and why.

8. Security

- a. The Business has ensured that personal data is stored securely using modern software that is kept up-to date.
- b. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
- c. When personal data is deleted, this will be done safely so that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions are in place.

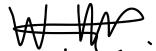
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9. Use of Data

It is Barcham Trees Plc policy not to pass any personal information onto any other Business for any reason. This includes information around order history, supplier/customer database information or any other personal information held by the Business. The information stored by Barcham Trees Plc is purely for the core Business functions.

10. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Business shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.



Warren Holmes-Chatfield
Managing Director
Barcham Trees Plc

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