

# PRIVACY AND PERSONAL DATA PROTECTION POLICY



Sparklean Limited  
Harrow Close,  
Rainworth,  
Mansfield,  
Nottinghamshire,  
NG21 0AS Company

Reg No: 16506258

Tel: 0333 880 8263

[policies@sparkleanlimited.co.uk](mailto:policies@sparkleanlimited.co.uk) | [www.sparkleanlimited.co.uk](http://www.sparkleanlimited.co.uk)

## 1. Purpose

Sparklean Limited recognises the importance of protecting the personal data of our employees, clients, suppliers and other individuals with whom we interact. This Privacy and Personal Data Protection Policy sets out how we collect, use, store and share personal data in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and related legislation, ensuring that all personal information is handled lawfully, fairly and transparently.

## 2. Scope

This policy applies to all personal data held or processed by Sparklean Limited in relation to job applicants, current and former employees, contractors, clients, suppliers, website users and any other individuals whose information we obtain in the course of our business. It covers data in any format, including electronic records, paper files, photographs, CCTV footage and voice recordings.

## 3. Definitions and Legislation

For the purposes of this policy, “personal data” means any information relating to an identifiable living individual. “Special category data” means personal data that is more sensitive, such as health, racial or ethnic origin, religious beliefs or trade union membership. “Processing” covers any operation performed on personal data, including collection, recording, organisation, storage, retrieval, use, disclosure, erasure and destruction. Sparklean Limited will comply with all applicable requirements of the UK GDPR, the Data Protection Act 2018 and guidance issued by the Information Commissioner’s Office (ICO).

## 4. Policy Statement

Sparklean Limited is committed to respecting individual privacy and protecting personal data against unauthorised or unlawful processing, accidental loss, destruction or damage. We will ensure that personal data is collected only for specified, explicit and legitimate purposes, that it is adequate, relevant and limited to what is necessary, and that it is retained only for as long as required by law or business need.

## 5. Data Protection Principles

In handling personal data, we adhere to the six principles set out in UK GDPR. We process data lawfully, fairly and in a transparent manner. We collect data for specified, explicit and legitimate purposes and do not further process it in a manner that is incompatible with those purposes. We keep personal data accurate and, where necessary, up to date. We retain data only for the period necessary to fulfil the purpose of processing or as required by statute. We implement appropriate technical and organisational measures to ensure the security of personal data, protecting it against unauthorised or unlawful processing and against accidental loss, destruction or damage. We also take responsibility for and will be able to demonstrate compliance with these principles.

## 6. Lawful Basis for Processing

Every instance of personal data processing at Sparklean Limited is underpinned by a lawful basis as defined by UK GDPR. These bases include performance of a contract, compliance with a legal obligation, protection of vital interests, consent, performance of a task carried out in the public interest or in the exercise of official authority, or our legitimate interests where such interests are not overridden by the rights and freedoms of data subjects. We will identify and document the lawful basis for each processing activity.

## 7. Data Subject Rights and Access Requests

Individuals whose data we process have a number of rights, including the right to be informed about processing, to access their personal data, to rectify inaccurate information, to erase data where permitted, to restrict processing, to data portability, to object to processing, and to

challenge automated decision-making. Sparklean Limited will respond to any valid data subject request within one calendar month, extending by a further two months if requests are complex or numerous, and will communicate any extension and the reasons for delay to the requester.

## 8. Data Security and Confidentiality

We implement appropriate security measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures include secure storage facilities, access controls, user authentication, encryption where appropriate, secure network architecture, regular security testing and robust backup procedures. All employees, contractors and third-party processors with access to personal data are required to maintain confidentiality and to report any suspected data breach immediately to the Data Protection Officer.

## 9. Data Breach Notification

Sparklean Limited has a documented incident-response plan to deal with any suspected or actual personal data breach. On becoming aware of a breach, we will contain and assess its impact, take steps to remediate and recover data where possible and document the facts and corrective actions. If the breach is likely to result in a risk to the rights and freedoms of data subjects, we will notify the Information Commissioner's Office within 72 hours of becoming aware, and, where required, we will inform affected individuals without undue delay.

## 10. Roles and Responsibilities

The Board of Directors has ultimate responsibility for the protection of personal data and compliance with this policy. The Data Protection Officer (or appointed lead) oversees data protection strategies, provides guidance, monitors compliance and acts as the point of contact for the Information Commissioner's Office and data subjects. Senior managers must ensure that their teams understand and adhere to this policy, while all employees, contractors and volunteers are required to follow data protection procedures and attend mandatory training on privacy and data security.

## 11. Data Retention and Disposal

Sparklean Limited retains personal data only for as long as necessary to fulfil the purposes for which it was collected or to satisfy legal, regulatory or tax obligations. We maintain retention schedules for different categories of data and conduct regular reviews to identify records that are no longer required. When data is no longer needed, we ensure its secure disposal through appropriate methods such as shredding of documents or secure deletion of electronic files.

## 12. Training and Awareness

We provide all employees with regular training on data protection principles, information-security best practices and their individual responsibilities under this policy. Refresher courses and updates are delivered whenever there are significant changes in legislation, regulation or internal procedures. The Data Protection Officer communicates policy updates, guidance and reminders to reinforce a culture of privacy throughout the organisation.

## 13. Monitoring and Review

This Privacy and Personal Data Protection Policy will be reviewed at least annually or more frequently in response to changes in legislation, regulatory guidance, business processes or identified weaknesses in our data-protection measures. The Data Protection Officer will conduct regular audits of processing activities, security controls and breach-response procedures, and will report findings and recommendations to senior management. Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or contract.