

Gondolin Land & Water GDPR and Data Protection Policy

At Gondolin Land & Water we regard the lawful and correct treatment of data relating to our staff, clients, sub-contractors and co-professionals as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. To this end we have established this GDPR and Data Protection policy to support us in maintaining compliance. It is mandatory for all employees of Gondolin Land & Water to comply with this policy.

We are committed to ensuring that:

- Processing of data will be fair, lawful and transparent;
- > Data will be collected for specific, explicit, and legitimate purposes;
- Data collected will be adequate, relevant and limited to what is necessary for the purposes of processing;
- > Data will be kept accurate and up to date;
- > Data is not kept for longer than is necessary for its given purpose;
- Data will be processed in a manner that ensures appropriate security of personal data, protected against unauthorized or unlawful processing and against accidental loss, destruction or damage;
- > All relevant persons have the right to be informed of personal data that is held on them;
- All relevant persons have the right of access to the data we hold on them;
- All relevant persons have the right for any inaccuracies in the data we hold on them, to be corrected or deleted where appropriate.

To maintain security of all data we will ensure that:

- > where hard copy personal information is held, adequate security is in place;
- where data is computerized, it is held on password protected IT systems;
- > all passwords and access to the Gondolin Land & Water computer network is removed for all former staff;
- All data breaches will be recorded. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

In order to protect the personal data of relevant individuals, those within our business who must process data as part of their role have been made aware of our policies on data protection and have received appropriate training. Detailed information on managing data is available to all employees in the Gondolin Land & Water Employee Handbook.

To facilitate the successful implementation of this GDPR and Data Protection Policy, we have appointed a director with responsibility for reviewing and auditing our data protection systems to ensure ongoing compliance with current legislation.

Zak Ritchie Managing Director April 2025