

## Data Protection Policy

### Policy Statement

SGC Holdings Ltd trading as SGC Security Services (“SGC”) is committed to protecting the personal data it processes and to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

SGC recognises the importance of handling personal data lawfully, fairly, and transparently, and is committed to safeguarding the rights and privacy of individuals, including employees, applicants, clients, suppliers, and other individuals whose personal data we process.

### Scope

This policy applies to all personal data processed by SGC, whether held electronically or in paper form.

It applies to all employees, contractors, agency workers, and third parties who process personal data on behalf of SGC.

### Roles and Responsibilities

SGC acts as the data controller for the personal data it processes.

Senior management has overall responsibility for ensuring compliance with data protection legislation.

A nominated senior manager has responsibility for overseeing data protection matters and for acting as the point of contact for data protection queries.

All staff who handle personal data are personally responsible for ensuring that data is processed in accordance with this policy and applicable legislation.

### Data Protection Principles

SGC processes personal data in accordance with the UK GDPR principles. Personal data must be:

1. Processed lawfully, fairly, and transparently
2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary

4. Accurate and kept up to date
5. Kept for no longer than necessary
6. Processed securely to protect against unauthorised or unlawful processing, loss, or damage
7. Processed in a manner that demonstrates accountability

### **Lawful Bases for Processing**

SGC will only process personal data where a lawful basis applies. These may include:

- Processing necessary for the performance of a contract
- Processing required to comply with a legal obligation
- Processing necessary for legitimate business interests
- Consent, where required and appropriate

Consent will only be relied upon where it is freely given, specific, informed, and capable of being withdrawn.

### **Special Category Personal Data**

Special category personal data will only be processed where a valid lawful condition applies and where appropriate safeguards are in place.

Access to such data will be strictly limited.

### **Individual Rights**

Individuals have rights under data protection legislation, including the right to:

- Access their personal data
- Request rectification of inaccurate data
- Request erasure of data
- Restrict or object to processing
- Request data portability (where applicable)

Requests must be made in writing and will be responded to without undue delay and within statutory time limits.

### **Data Security**

SGC will implement appropriate technical and organisational measures to protect personal data, including:

- Access controls
- Secure storage and handling
- Password protection and authentication controls
- Secure disposal of data and equipment

All staff must take reasonable steps to ensure that personal data is protected from unauthorised access or disclosure.

### **Personal Data Breaches**

All actual or suspected personal data breaches must be reported immediately in accordance with Company procedures.

Where required, breaches will be reported to the Information Commissioner's Office and, where appropriate, to affected individuals.

### **Data Sharing and Transfers**

Personal data will only be shared where there is a lawful basis to do so and where appropriate safeguards are in place.

Where personal data is transferred outside the UK, SGC will ensure that appropriate legal safeguards are applied in accordance with UK GDPR requirements.

### **Third-Party Processing**

Where third parties process personal data on behalf of SGC, written agreements will be in place to ensure that appropriate data protection and security standards are maintained.

SGC will take reasonable steps to ensure that such third parties comply with applicable data protection obligations.

### **Retention and Disposal**

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected and to meet legal and regulatory requirements.

Data will be disposed of securely in accordance with Company retention and disposal arrangements.

### **Training and Awareness**



SGC will provide appropriate data protection training to staff to ensure awareness of responsibilities under this policy and data protection legislation.

### **Compliance**

Failure to comply with this policy may result in disciplinary action and could expose SGC to legal and regulatory sanctions.

### **Review**

This policy will be reviewed periodically and updated as necessary to reflect changes in legislation, guidance, or business operations.

Name	Paul Macarthur	Position	Managing Director
Signature	 A handwritten signature in black ink, appearing to read 'Paul Macarthur'.	Date	14/01/2026