TWC Draincare Ltd
Data Protection Policy
Date: May 2026

1. **Introduction**

1.1. This Policy sets out the obligations of the Company regarding data protection and the rights of its employees in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation ("GDPR").

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2. **The Data Protection Principles**

2.1. This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

2.1.1. Processed lawfully, fairly, and in a transparent manner in relation to the data subject.

2.1.2. 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.

2.1.3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

2.1.4. 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 it is processed, is erased, or rectified without delay.

2.1.5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is 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 the data subject.

2.1.6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

3. **The Rights of Data Subjects**

3.1. The GDPR sets out the following rights applicable to data subjects (please refer to the parts of this policy indicated for further details):

3.1.1. The right to be informed (Part 12).

3.1.2. The right of access (Part 13).

3.1.3. The right to rectification (Part 14);

3.1.4. The right to erasure (also known as the 'right to be forgotten') (Part 15);

3.1.5. The right to restrict processing (Part 16);

3.1.6. The right to data portability (Part 17);

3.1.7. The right to object (Part 18); and

4. **Lawful, Fair and Transparent Data Processing**

4.1. The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:

4.1.1. The data subject has given consent to the processing of their personal data for one or more specific purposes.

4.1.2. The processing is necessary for the performance of a contract to which the data subject is a party, or to take steps at the request of the data subject prior to entering a contract with them.

4.1.3. The processing is necessary for compliance with a legal obligation to which the data controller is subject.

4.1.4. The processing is necessary to protect the vital interests of the data subject or of another natural person.

4.1.5. The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or

4.1.6. The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, where the data subject is a child.

4.2. If the personal data in question is "special category data" (also known as "sensitive personal data" (for example, data concerning the data subject's race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), at least one of the following conditions must be met:

4.2.1. The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so);

4.2.2. The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law (insofar as it is authorised by EU or EU Member State law or a collective agreement

pursuant to EU Member State law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);

4.2.3. The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.

4.2.4. The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;

4.2.5. The processing relates to personal data which is clearly made public by the data subject.

4.2.6. The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity.

4.2.7. The processing is necessary for substantial public interest reasons, based on EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject.

4.2.8. The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;

4.2.9. The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of EU or EU Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or

4.2.10. The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

5. **Specified, Explicit and Legitimate Purposes**

5.1. The Company collects and processes the personal data set out in Parts 19 to 21 of this Policy. This includes:

5.1.1. Personal data collected directly from employee data subjects**.**

5.1.2. Personal data collected directly from third parties.

5.2. The specific purposes for which the Company collects, processes, and holds such personal data are set out in Parts 19 to 21 of this Policy (or for other purposes expressly permitted by the GDPR).

5.3. Data subjects are kept informed at all times of the purpose or purposes for which the Company uses their personal data. Please refer to Part 12 for more information on keeping data subjects informed.

6. **Adequate, Relevant and Limited Data Processing**

6.1. The Company will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed) as under Part 5, above, and as set out in Parts 19 to 21, below.

7. **Accuracy of Data and Keeping Data Up to Date**

7.1. The Company shall ensure that all personal data collected, processed, and held by it is kept accurate and up to date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 14, below.

7.2. The accuracy of personal data shall be checked when it is collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

8. **Data Retention**

8.1. The Company shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.

8.2. 8.2 When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

9. **Secure Processing**

9.1. The Company shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in Parts 26 to 30 of this Policy.

10. **Accountability and Record-Keeping**

10.1. The Company's Data Protection Officer is Martin Williams.

10.2. The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other data protection-related policies, and with the GDPR and other applicable data protection legislation.

10.3. The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

10.3.1. The name and details of the Company, its Data Protection Officer, and any applicable third-party data processors;

10.3.2. The purposes for which the Company collects, holds, and processes personal data;

10.3.3. Details of the categories of personal data collected, held, and processed by the Company, and the categories of data subject to which that personal data relates;

10.3.4. Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;

10.3.5. Details of how long personal data will be retained by the Company and

10.3.6. Detailed descriptions of all technical and organisational measures taken by the Company to ensure the security of personal data.

11. **Data Protection Impact Assessments**

11.1. The Company shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data.

11.2. Data Protection Impact Assessments shall be overseen by the Data Protection Officer and shall address the following:

11.2.1. The type(s) of personal data that will be collected, held, and processed;

11.2.2. The purpose(s) for which personal data is to be used;

11.2.3. The Company's objectives;

11.2.4. How personal data is to be used;

11.2.5. The parties (internal and/or external) who are to be consulted;

11.2.6. The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;

11.2.7. Risks posed to data subjects;

11.2.8. Risks posed both within and to the Company; and

11.2.9. Proposed measures to minimise and handle identified risks.

12. **Keeping Data Subjects Informed**

12.1. The Company shall provide the information set out in Part 12.2 to every data subject:

12.1.1. Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and

12.1.2. Where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:

12.1.2.1. if the personal data is used to communicate with the data subject, when the first communication is made; or

12.1.2.2. if the personal data is to be transferred to another party, before that transfer is made; or

12.1.2.3. as soon as reasonably possible and in any event not more than one month after the personal data is obtained.

12.2. The following information shall be provided:

12.2.1. Details of the Company including, but not limited to, the identity of its Data Protection Officer;

12.2.2. The purpose(s) for which the personal data is being collected and will be processed (as detailed in Parts 21 to 25 of this Policy) and the legal basis justifying that collection and processing;

12.2.3. Where applicable, the legitimate interests upon which the Company is justifying its collection and processing of the personal data;

12.2.4. Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;

12.2.5. Where the personal data is to be transferred to one or more third parties, details of those parties;

12.2.6. Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the "EEA"), details of that transfer, including but not limited to the safeguards in place (see Part 32 of this Policy for further details);

12.2.7. Details of data retention;

12.2.8. 12.2.8 Details of the data subject's rights under the GDPR; 12.2.9 Details of the data subject's right to withdraw their consent to the Company's processing of their personal data; 12.2.10 Details of the data subject's right to complain to the Information

12.2.9. Commissioner's Office (the "supervisory authority" under the GDPR);

12.2.10. Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it.