

# The Carfella Ltd Data Protection Policy

**Effective Date:** 1<sup>st</sup> July 2024

**Version:** 1.0

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## 1. Introduction

The Carfella Ltd is committed to ensuring that personal data is processed in compliance with data protection laws and regulations. This Data Protection Policy sets out how we collect, store, use, and protect personal data in accordance with applicable legislation, including the General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA), and other relevant laws.

We recognize the importance of personal data and are dedicated to protecting the privacy and security of individuals' information.

## 2. Scope

This policy applies to all employees, contractors, and third-party service providers of [Your Company Name] who handle personal data. It covers all personal data collected, processed, and stored by the company, including:

- Personal information of customers, clients, employees, and contractors
- Sensitive personal data (e.g., health information, financial data, etc.)
- Data collected online, offline, and via third parties

## 3. Data Collection

We collect personal data in various ways, including through:

- Forms on our website or other platforms
- Transactions or interactions with customers or clients
- Emails, surveys, or other communications

We ensure that personal data is collected only for specific, legitimate purposes and that individuals are aware of how their data will be used.

- **Lawful basis for processing:** We process personal data based on consent, contractual necessity, legal obligations, legitimate interests, or other lawful bases as defined under data protection laws.

## 4. Data Use

Personal data collected by [Your Company Name] will only be used for the following purposes:

- To provide products or services

- To manage relationships with customers, clients, and employees
- To comply with legal obligations
- For marketing, research, and improvement of services
- For internal record-keeping and administrative purposes

We do not use personal data for purposes other than those specified at the time of collection.

## 5. Data Storage and Retention

- **Data storage:** Personal data is stored in secure systems, both digital and physical, with access limited to authorized personnel only.
- **Retention period:** We retain personal data only for as long as necessary to fulfill the purposes for which it was collected or as required by law. After this period, personal data will be securely deleted or anonymized.
- **Data disposal:** When personal data is no longer needed, it will be disposed of securely to prevent unauthorized access.

## 6. Data Security

We implement appropriate technical and organizational measures to ensure the security of personal data, including:

- Use of encryption for sensitive data
- Firewalls, antivirus software, and secure servers to protect against unauthorized access
- Regular security audits and risk assessments
- Staff training on data protection best practices

We strive to protect personal data from unauthorized access, loss, or damage. However, no method of transmission over the internet or electronic storage is 100% secure, and while we strive to protect personal data, we cannot guarantee absolute security.

## 7. Data Access and Sharing

- **Internal access:** Access to personal data is restricted to employees and contractors who need it to perform their job duties.
- **Third-party sharing:** We may share personal data with third parties (e.g., service providers, business partners, legal authorities) only when necessary and where required by law. Third parties must adhere to data protection standards and provide assurances that personal data will be handled securely.

We do not sell or lease personal data to third parties.

## 8. Data Subject Rights

Individuals have certain rights concerning their personal data. These include:

- **Right to access:** The right to request copies of the personal data we hold.

- **Right to rectification:** The right to request that inaccurate or incomplete personal data be corrected.
- **Right to erasure:** The right to request that personal data be deleted, subject to certain conditions.
- **Right to object:** The right to object to processing based on legitimate interests or for direct marketing purposes.
- **Right to data portability:** The right to request the transfer of personal data to another service provider.

To exercise any of these rights, individuals should contact [Insert contact details for the Data Protection Officer (DPO) or relevant department].

## 9. Incident Response

In the event of a data breach, we have procedures in place to:

- Investigate and assess the breach
- Notify the relevant authorities and individuals within the required timeframes (usually within 72 hours of discovery)
- Take corrective action to prevent future breaches

## 10. Compliance and Monitoring

We are committed to complying with all relevant data protection laws and regulations. The company regularly reviews this policy and conducts audits to ensure compliance. Any breaches of this policy will be taken seriously and may result in disciplinary action.

We will also ensure that employees are trained on data protection principles and that internal controls are regularly monitored for effectiveness.

## 11. Enforcement

Employees, contractors, or third-party partners who violate this policy may face disciplinary action, including termination of employment or contracts, as appropriate. Any violations of data protection laws may also result in legal action.

## 12. Policy Review and Updates

This policy will be reviewed annually or whenever there are significant changes to relevant laws or the company's practices. Any changes to the policy will be communicated to all employees and other relevant parties.

## 13. Contact Information

For any questions or concerns regarding this policy, or to exercise your data protection rights, please contact:

### **Data Protection Officer (DPO)**

Steve Vass

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