

General Data Protection Regulation (GDPR) Policy

GDPR Policy

Bowmer + Kirkland, including any of the subsidiaries in which they have a controlling interest both in the UK and abroad, is committed to protecting the privacy and data security of personal information in accordance with the requirements of the Data Protection Act 2018 and other relevant data protection legislation.

This policy applies to all employees both former, current and future.

Data Protection Principles:

Bowmer + Kirkland confirm that all personal information we hold, or will hold, on our staff will be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, is erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes;

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.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Data Sharing

Bowmer + Kirkland may have to share personal data with third parties, including third-party service providers and other entities within the Group.

We require third parties to respect the security of personal data and treat it in accordance with the law.

Data retention

Bowmer + Kirkland will only retain personal information for as long as necessary to fulfil the purpose that it was collected for, including for the purpose of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purpose for which we process personal data and the applicable legal requirements.

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GDPR Policy (cont)

GDPR Privacy Notice

To inform all employees of the personal information that is collected, stored and used, Bowmer + Kirkland have issued a GDPR Privacy Notice, available to all employees. This document informs employees as to how and why such personal information is held, in accordance with the General Data Protection Regulations (GDPR).

Signed:

A handwritten signature in blue ink that reads "Jack Kirkland".

J A C Kirkland - Chairman
Date 1st February 2025

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