

GDPR Compliance and Data Protection Policy

Clever Cherry (Midlands) Ltd

1. Policy Statement

Clever Cherry (Midlands) Ltd ("Clevercherry") is committed to protecting personal data and ensuring compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and all applicable data protection legislation.

We recognise the importance of safeguarding personal information and maintaining the rights and freedoms of individuals whose data we process. We are committed to processing personal data lawfully, fairly, transparently and securely.

This policy applies to all employees, contractors, suppliers and third parties acting on behalf of Clevercherry.

2. Objectives

The objectives of this policy are to:

- Ensure compliance with all applicable data protection legislation.
- Protect the privacy rights of clients, customers, employees, suppliers and website users.
- Maintain appropriate technical and organisational measures to safeguard personal data.
- Prevent unauthorised access, disclosure, alteration or destruction of personal information.
- Ensure all personal data is processed fairly, lawfully and transparently.
- Support the rights of data subjects under UK GDPR.

3. Data Protection Principles

Clevercherry processes personal data in accordance with the following principles:

- **Lawfulness, Fairness and Transparency**
Personal data will only be processed where a lawful basis exists and individuals will be informed about how their data is used.
- **Purpose Limitation**
Personal data will only be collected for specified, explicit and legitimate purposes.
- **Data Minimisation**
Only personal data necessary for the relevant purpose will be collected and processed.
- **Accuracy**
Reasonable steps will be taken to ensure personal data remains accurate and up to date.
- **Storage Limitation**
Personal data will be retained only for as long as necessary to fulfil the purpose for which it was collected or to satisfy legal, regulatory or contractual obligations.
- **Integrity and Confidentiality**
Appropriate security measures will be implemented to protect personal data against unauthorised access, loss, misuse, alteration or disclosure.
- **Accountability**

Clevercherry accepts responsibility for demonstrating compliance with data protection legislation and maintaining appropriate governance processes.

4. Human Resources and Responsibilities

Clevercherry maintains the necessary human resources to ensure ongoing compliance with UK GDPR and data protection legislation.

Responsibilities include:

- **Senior Management**
Senior management are responsible for ensuring appropriate resources, policies and governance arrangements are in place to support compliance.
- **Employees**
All employees are responsible for handling personal data securely and in accordance with company policies, contractual obligations and legal requirements.
- **Suppliers and Third Parties**
Where suppliers or third parties process personal data on our behalf, appropriate contractual safeguards and due diligence processes will be applied.

5. Technical and Organisational Measures

Clevercherry maintains appropriate technical and organisational measures to protect personal data, including:

- Secure password management procedures.
- Access controls based on business need.
- Multi-factor authentication where available.
- Secure cloud-based collaboration and storage platforms.
- Regular software updates and security patching.
- Anti-virus and endpoint protection measures.
- Secure hosting environments where applicable.
- Controlled access to client systems and information.
- Backup and recovery procedures.
- Secure disposal of electronic equipment and data where required.

As stated within our Privacy Policy, Clevercherry implements technologies and policies designed to protect personal information from unauthorised access and improper use and reviews these measures as technologies evolve.

6. Data Subject Rights

Clevercherry recognises and supports the rights of data subjects under UK GDPR, including:

- Right to be informed.
- Right of access.
- Right to rectification.
- Right to erasure.
- Right to restrict processing.
- Right to data portability.
- Right to object.
- Rights relating to automated decision making and profiling.

Requests relating to these rights will be handled promptly and in accordance with applicable legislation.

7. Data Breach Management

Any suspected or actual personal data breach will be reported immediately to senior management. Clevercherry will investigate all incidents and, where required, notify affected parties and the Information Commissioner's Office (ICO) in accordance with statutory requirements.

8. Supplier and Third-Party Management

Where personal data is shared with third-party providers in connection with the delivery of services, Clevercherry will:

- Undertake appropriate due diligence.
- Ensure suitable contractual safeguards are in place.
- Verify that suppliers maintain appropriate security standards.
- Monitor compliance where appropriate.

9. Training and Awareness

Employees are expected to understand their responsibilities regarding data protection and information security.

Data protection awareness forms part of Clevercherry's ongoing governance and operational practices, ensuring personal data is handled responsibly and securely.

10. Monitoring and Review

This policy will be reviewed periodically and updated as necessary to reflect legislative, regulatory, operational or technological changes.

Compliance with this policy will be monitored through internal governance processes and operational reviews.

11. Commitment for Contract Delivery

Clever Cherry (Midlands) Ltd confirms that it has in place the human and technical resources necessary to perform contracts in compliance with UK GDPR and to ensure the protection of the rights and freedoms of data subjects.

This includes appropriate personnel, governance processes, technical safeguards, supplier management controls and operational procedures necessary to support secure and lawful data processing throughout the delivery of client services.

Approved on behalf of Clever Cherry (Midlands) Ltd

Nigel Wilson

Managing Director

Date: 1st January 2026