

## Data Protection & Information Security Policy

Company: Connexion Developments Ltd

Issue Date: January 2026

**Review Cycle:** Annual or upon significant business change

### 1. Purpose

Connexion Developments Ltd is committed to protecting the confidentiality, integrity, and availability of personal data and business information. This Data Protection & Information Security Policy sets out how we collect, process, store, and protect information in line with applicable data protection laws and recognised good practice.

This policy supports our obligations under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and related legislation.

### 2. Scope

This policy applies to:

- All employees and directors of Connexion Developments Ltd
- Temporary staff, contractors, and agency workers
- Third parties who process data on our behalf

It covers all personal data and business information held in electronic or paper-based form.

### 3. Data Protection Principles

Connexion Developments Ltd processes personal data in accordance with the following principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy and currency
- Storage limitation
- Integrity and confidentiality
- Accountability

Personal data will only be collected and used for legitimate business purposes.

### 4. Types of Data We Process

We may process the following categories of data:

- Customer and supplier contact details
- Employee and applicant information
- Credit account and transactional data
- Technical, commercial, and contractual information
- Website, e-commerce, and enquiry data

Sensitive personal data is handled with additional care and protection.

### 5. Lawful Basis for Processing

Personal data is processed on one or more of the following lawful bases:

- Performance of a contract
- Compliance with legal obligations
- Legitimate business interests
- Consent, where required

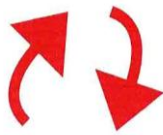
Data subjects are informed of how their data is used via privacy notices and contractual documentation.

### 6. Information Security Measures

Connexion Developments Ltd implements proportionate technical and organisational measures to protect information, including:

- Access controls and user permissions
- Password protection and authentication controls
- Secure storage of paper records
- Firewalls, antivirus, and system updates
- Secure handling of portable devices and media
- Controlled access to premises and systems
- These measures may include periodic security assessments and vulnerability scanning appropriate to the nature of our systems.

Information security measures are reviewed periodically to reflect evolving risks.



## 7. Data Retention

Personal data is retained only for as long as necessary to meet legal, contractual, and business requirements. When data is no longer required, it is securely deleted or destroyed in accordance with retention procedures.

## 8. Data Sharing and Third Parties

Personal data may be shared with trusted third parties where necessary for legitimate business purposes, including:

- Payment providers
- IT and hosting providers
- Logistics and courier partners
- Professional advisers

All third parties are expected to maintain appropriate data protection and security standards.

## 9. Data Subject Rights

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

- Access their personal data
- Request correction of inaccurate data
- Request erasure where applicable
- Restrict or object to processing
- Data portability, where applicable

Requests will be handled in accordance with statutory timescales.

## 10. Data Breaches and Incidents

Any actual or suspected data breach or security incident must be reported immediately to management.

Incidents will be investigated promptly, and where required, reported to the relevant supervisory authority and affected individuals.

## 11. Responsibilities

### Management

Management is responsible for:

- Ensuring compliance with data protection and information security requirements
- Implementing appropriate controls and procedures
- Reviewing this policy and related practices

### Employees and Contractors

All individuals are responsible for:

- Handling data securely and responsibly
- Following company procedures and guidance
- Reporting concerns, incidents, or weaknesses promptly

## 12. Training and Awareness

Connexion Developments Ltd ensures that employees receive appropriate guidance and awareness relating to data protection and information security relevant to their role.

## 13. Policy Review

This policy will be reviewed annually or following significant changes to legislation, business operations, or information security risks.

Approved by:

Managing Director

For and on behalf of Connexion Developments Ltd