



A Company of Bailiffs Ltd

Data Protection Policy

1. Purpose

- 1.1. The purpose of this policy is to ensure ACOB Ltd complies with UK Law in relation to the protection of personal data concerning any individual recorded, retained and processed, and respects the privacy of all individuals it has dealings with as clients, professional contacts, and individuals subject of Company activities.
- 1.2. This policy concerns personal data held by the Company in relation to any person, including Directors, employees of the Company, or sub-contractors or any customer, supplier, including any individual subject of ACOB Ltd enforcement action. Personal data is described below in more detail, but the concept is very broad and may include any information about any individual held by the Company.

2. Scope

- 2.1. Data protection laws are overseen by the Information Commissioners Office (ICO) who has powers to take legal action against businesses or individuals acting unlawfully. Any Director, or employee or sub-contractor may make themselves individually liable to legal action by the Information Commissioner and/or by any individual whose information they have disclosed in breach of data protection legislation and who suffers loss as a result. This policy is designed to prevent such potential damage to the Company and its Staff and to ensure that personal data processed by the Company is dealt with in full compliance with the law.
- 2.2. ACOB Ltd is registered with the ICO.
- 2.3. ACOB Ltd Director Martyn Meekums is nominated as the Data Controller, with responsibility for data processing and compliance with data protection legislation within the Company.

3. Definitions

- 3.1. Data means recorded, stored information irrespective of the medium by which it is recorded or on which it is stored. It may be on a computer or on paper. Having been recorded in writing, it will still be an unlawful disclosure of data if it is subsequently given to an unauthorised individual directly or indirectly, in written format or verbally.
- 3.2. Personal Data means any information about a *living* individual from which they can be identified.
- 3.3. Sensitive Personal Data means data falling within particular categories of personal information, relating to any person's: racial or ethnic origin; political beliefs, opinions, or affiliations; religious or some philosophical beliefs; membership or non-membership of trade unions; physical, mental, or sexual health, condition or preferences; participation in, allegations pertaining to or the progress of or sentencing for any criminal acts or proceedings.
- 3.4. Processing means any action involving data including the passive retention of it. It includes all stages from acquiring to disposing of data and all actions in between while the Company is in control of the data such as recording, maintaining, storing, updating, or amending, disclosing, or deleting it.
- 3.5. Data subject: means any person to whom the personal information relates. This includes ACOB Ltd Directors, Employees, Sub-Contractors, Professional contacts, customers, and individuals subject of action by ACOB Ltd.
- 3.6. Data controllers: means the individuals or organisations responsible for complying with the legal obligations in relation to the processing of personal data including the establishment of practices and procedures and compliance with those procedures by monitoring the processing of such data.
- 3.7. Data processors: means all persons or organisations acting on behalf of the data controller. This includes third party organisations or persons with whom the data controller collaborates in processing personal data.
- 3.8. Data users: means ACOB Ltd Directors, employees and sub-contractors processing personal data on behalf of the Data Controller.
- 3.9. Note: The legislation imposes legal obligations on the Company in relation to the personal data that it acquires on behalf of, or from, any third-party data controller and the Company may be a data processor in relation to personal data of a data subject with whom it has no contact or other relationship.

4. Principles and Compliance

4.1. ACOB Ltd will ensure that all personal data is processed in accordance with the following fundamental principles. The Company will:

- Process personal data and sensitive personal data fairly and lawfully, in accordance with the data subject's rights.
- Ensure that personal data acquired for a specific purpose is adequate for and limited to that specific purpose.
- Update personal data and instigate appropriate and proportionate procedures to keep it up to date.
- Retain personal data no longer than absolutely necessary and destroy as appropriate. Generally speaking, personal data will be destroyed after 1 year unless there is a sound operational or legal reason to retain it for longer. The reason for retaining the information will be recorded. Data relating to the Company's legal obligations e.g. accounting and HMRC obligations will be retained for a minimum 5 years.
- Maintain personal data securely and instigate appropriate and proportionate procedures to prevent loss or misuse. Transfer of data should be password protected if its unauthorised disclosure could be likely to have legal implications, or may cause reputational damage to ACOB Ltd or an intended recipient, if the data was disclosed to an unauthorised third party.
- Carry out appropriate risk assessments for the transportation and delivery of personal data including transfer to a third party. Sensitive data will be transferred and stored by secure means.
- Facilitate access of all personal data held by the Company as lawful and appropriate, at no cost if information is concerning the data subject, and subject to exceptions at the request of a data which is 'manifestly unfounded or excessive' upon which payment of a fee will be reasonably determined the ACOB Ltd Directors.

5. Subject Access Requests

- 5.1. Data subjects have the legal right to request details of information held about them by the Company.
- 5.2. Subject access requests have to be made by the data subject in writing. Any subject access requests received by ACOB Ltd will be referred to the Data Controller.
- 5.3. The Company will respond to any subject access requests promptly, and in any event, within one month.

ENDS

Date of Policy: 31 October 2025