



Data Protection Policy

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Issue Date:	15/05/2025	Next Review Due:	15/05/2026
Document Owner:	Sarah Priestley Chief Privacy Officer	Document Scope:	All Group companies



Issue, Review and Amendment

This guidance shall be made available through M Group intranet and its issue notified to relevant companies’ employees through an internal memorandum or other appropriate form of communication.

The guidance shall be utilised by the businesses encompassed by the Group scope. Where revisions are required, they shall be made by replacement of the applicable page(s). An amended revision number and the date of revision shall identify each revised document; this shall be detailed within the document revision table below.

When changes affect a considerable number of pages, this document shall be re-issued/revised in its entirety, incorporating all previous revisions. A number shall identify the issue and each issue shall cancel and replace all previous issues and revisions. Revisions shall be identified by a number and shall replace the previous revision.

Revisions shall be notified to relevant employees through an internal memorandum or other appropriate form of communication.

Document Reviews			
Date	Version	Owned By	Changes
07 May 2024	1.0	Ted Sefia, DPO	New Policy
16 May 2025	2.0	Sarah Priestley, CPO	Review and update
05 Mar 2026	2.1	Sarah Priestley, CPO	Minor amendment to subject rights following Data Use & Access Act.

Our Policy

M Group Services Limited and its group companies (the Group) is committed to upholding the tenets of data privacy and keeping personal data which we are custodians of safe. The UK General Data Protection Regulation (UK GDPR) provides (amongst other things) the principles of data protection as well as the rights of a data subject. Our approach to data protection is consistent with, and guided by, the principles of the UK GDPR.

We acknowledge the link between personal data protection and the human rights of a data subject and seek to ensure there are no lapses that may result in a contravention of the Human Rights Act whilst meeting with our requirements under data protection law.

Our Approach

We have produced a robust Privacy Information Management System (PIMS) to ensure the Group's compliance with UK GDPR. We are committed to reviewing the PIMS regularly to ensure it is fit for purpose, provides guidance on data protection, and addresses the rights of data subjects as a fundamental right of an individual. To access the Group's data protection documents and ensure your compliance with data protection laws, please view the PIMS [\[here\]](#).

This Data Protection Policy is intended to provide an overview of our strategy for handling the personal data of our personnel and customers. Through this Policy and the PIMS, our goal is to:

- Make clear the scope of the obligations of staff in relation to data protection;
- Ensure personal data is appropriately protected with adequate security measures; and
- Meet the requirements of current data-related legislation and its allied guidance.

Data Protection Principles

The Group's operations involve the collection, recording, use, disclosure, sharing, storage, erasure, and destruction of personal data in accordance with the following data protection principles:

- **Lawful Processing and Transparency:** We will process personal data lawfully, fairly and in a transparent manner.
- **Purpose Limitation:** We will collect personal data only for specified, explicit and legitimate purposes.
- **Data Minimisation:** We will only process personal data where it is adequate, relevant, and limited to what is necessary for the purposes of processing, and we will only retain personal data for the period necessary for processing.
- **Accuracy:** We will keep accurate personal data and take all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- **Storage Limitation:** We will not keep personal data in a form which permits identification of data subjects for any longer than is necessary.
- **Security:** We will adopt appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction, or damage.
- **Accountability:** We will maintain adequate records of our data processing activities to demonstrate compliance with legal requirements.

Data Protection Rights

This policy acknowledges the rights of a data subject in accordance with all applicable UK Data Protection Laws and we will comply appropriately with any legitimate request by a data subject relating to those rights. The rights granted by the UK GDPR are as follows:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

Data subjects also have the right to raise a complaint with M Group about how their data has been handled and we will comply with the requirements of the Data Protection Act 2018 to ensure that a complaints process is in place.

Training and Awareness

Appropriate training will be provided to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter (at least annually).

Individuals whose roles require regular access to personal data, or deal with special category data, or who are responsible for implementing this policy or responding to subject access requests under this policy, are required to receive additional training to help them understand their duties and how to comply with them.

Regular communications will be provided via the intranet on the data protection page and via posters which will be displayed prominently. The training will cover topics around the following:

- Data Protection Principles
- Rights of an Individual
- Data Security
- Data Retention
- Data Breaches
- Data Impact Assessments and Risk Evaluation and;
- Data Transfer including International Transfers

Responsibilities and Further Information

It is the responsibility of every individual working on behalf of the Group to comply with this Policy and applicable data protection laws.

Further details regarding the Group's approach to data protection (including the Group's data protection procedures) are available via the PIMS [\[here\]](#).

If you have any queries relating to data protection you should contact the Group Data Protection Officer in the first instance using the dedicated email address DP@mgrouppltd.com.



DATA PROTECTION POLICY

Authorisation

Sarah Priestley

M Group Services, Chief Privacy Officer.

