

# Trojan Lighting Solutions GDPR Policy

## 1. Purpose and Scope

Trojan Lighting Solutions (“The Company”) is committed to ensuring compliance with the General Data Protection Regulation (GDPR) and protecting the privacy and rights of individuals whose personal data we process. This policy outlines our approach to GDPR compliance, including how we handle, store, and process personal data in line with legal requirements. It applies to all employees, contractors, and third-party service providers acting on behalf of The Company.

This policy covers all personal data processed by The Company, including data related to employees, customers, suppliers, and other stakeholders, regardless of the format or medium. The scope includes all business operations and activities involving personal data processing, whether conducted within the European Union (EU), the European Economic Area (EEA), or internationally, where GDPR applies.

## 2. Roles and Responsibilities

To ensure GDPR compliance, The Company has defined clear roles and responsibilities:

- Data Protection Officer (DPO)

Stuart Aiken, is responsible for overseeing GDPR compliance, providing advice on data protection matters, and acting as the primary point of contact for data subjects and regulatory authorities.

- Senior Management

Senior leaders are responsible for ensuring their teams understand and comply with GDPR requirements, including the implementation of data protection practices within their departments.

- Employees

All employees are required to handle personal data responsibly, in accordance with this policy and GDPR principles. Employees must report any suspected data breaches or non-compliance issues immediately to the DPO or their line manager.

- Third-Party Processors

Vendors and service providers that process personal data on behalf of The Company must adhere to GDPR requirements and ensure adequate safeguards are in place to protect personal data.

## 3. Commitment to Protecting Personal Data and Privacy

The Company is committed to safeguarding the privacy and personal data of all individuals with whom we interact. We recognize the importance of transparency, accountability, and security in handling personal data. Our commitments include:

**Lawful Processing:** Ensuring all personal data is processed fairly, lawfully, and transparently, with a clear legal basis under GDPR.

**Data Minimization:** Collecting only the personal data necessary for specified purposes and ensuring it is accurate, up-to-date, and relevant.

**Data Security:** Implementing technical and organizational measures to protect personal data from unauthorized access, loss, alteration, or destruction.

**Rights of Data Subjects:** Respecting and facilitating individuals' rights under GDPR, including access, rectification, erasure, and objection.

**Breach Notification:** Reporting data breaches to the relevant supervisory authority within 72 hours and notifying affected individuals where necessary.

#### **4. Alignment with Company Operations and Objectives**

The principles of GDPR are embedded into The Company's operations and objectives, ensuring that data protection is integral to how we do business. This alignment is achieved through:

**Transparency:** Providing clear and concise information to data subjects about how their personal data is used, through privacy notices and other communications.

**Accountability:** Maintaining detailed records of processing activities and regularly auditing data protection practices to ensure ongoing compliance.

**Training and Awareness:** Educating employees on GDPR principles and their responsibilities to foster a culture of compliance and data protection awareness.

**Continuous Improvement:** Regularly reviewing and updating this policy, as well as other related procedures, to adapt to changes in regulations, technology, and business practices.

#### **5. Contact Information**

For any questions about this policy, or to exercise your rights under GDPR, please contact our Data Protection Officer:

Stuart Aiken

[stuart@trojan-lighting.co.uk](mailto:stuart@trojan-lighting.co.uk)

Rainford Industrial Estate, Unit 2, Sandwash Business Park, Sandwash Cl, Rainford WA11 8LY  
01744 368289

#### **6. Review and Updates**

This GDPR policy will be reviewed annually or as necessary to reflect changes in data protection regulations, business practices, or organizational structure. All updates will be communicated to employees and other relevant stakeholders.

Effective Date: 1/10/24

Last Reviewed: 12/12/24

Trojan Lighting Solutions

Stuart Aiken