



### **Statement of Policy**

B. & M. McHugh Ltd is a Business-to-Business (B2B) organisation but in the day to day running of the business there will be occasions where we may need to store and processes data of EU citizens for legal and business requirements.

The storage and processing of this information will fall within the legal requirements set out within the General Data Protection Regulation (GDPR).

### **Aims of this Policy**

B. & M. McHugh Ltd is committed to ensure that we store and processes data of EU citizens within the legal requirements set out within the General Data Protection Regulation (GDPR).

### **Achieving this Policy**

B. & M. McHugh Ltd aims to achieve this policy by:

- Appointing a Data Protection Officer;
- Understanding and recording the lawful basis of why and what personal data we hold and process at all times
- Design procedures that require the storage and processing of personal data with privacy in mind and set as the default;
- Having a process in place to detect, notify and investigate data breaches;
- Ensuring that requests for personal data requires opt in consent;
- Ensuring the sharing of personal data with 3<sup>rd</sup> parties has a lawful basis and those parties have a privacy policy in place;
- Ensuring that reasonable Subject Access Requests (SRA) are dealt with within one month of request and without charge.

### **Responsibility for this Policy**

Managing Director is the director responsible for the implementation of the board policy, together with the data protection officer, each director and manager within their own realm of responsibility.

### **Review of this Policy**

This policy will be subject to at least an annual review or following a data breach if sooner.

James McHugh  
Managing Director  
March 2021