

Rigby Morrison FM Ltd – Data Protection Policy in line with the GDP Regulations

Rigby Morrison FM Ltd is committed to complying with all relevant EU and Member State laws in respect of personal and business data, and the protection of the "rights and freedoms" of individuals whose information Rigby Morrison FM Ltd collects and processes in accordance with the General Data Protection Regulation (GDPR). All employees and personnel working with Rigby Morrison FM Ltd will follow the guidance of this policy when working with clients.

Scope

This policy along with the GDPR policy applies to all Rigby Morrison FM Ltd data processing functions, including those performed on customers', clients', employees', suppliers', partners' and companies' and any other data the organisation processes from any other source. Any breach of this policy will be dealt with according to the Company's disciplinary policy and could be a criminal offence. Partners and any third parties working with or for Rigby Morrison FM Ltd who have access to personal or business data will be expected to read, understand, and comply with this policy. No third party may access data held by Rigby Morrison FM Ltd without having first entered into data confidentiality agreement, which gives Rigby Morrison the right to audit compliance with the agreement.

Responsibilities and Roles under the General Data Protection Regulation

Rigby Morrison FM Ltd will act in compliance with this policy unless a third party has made us aware of any additional requirements dictated by their own policy. Directors of the company and those in managerial or supervisory roles are responsible for developing and encouraging good information-handling practices within Rigby Morrison; responsibilities are set out in individual job descriptions. The Directors are accountable for the management of personal and business data within the organisation and for ensuring that compliance with data protection legislation and good practice can be demonstrated. This accountability includes:

- development and implementation of the GDPR as required by this policy; and
- Security and risk management in relation to compliance with the policy.
- Ensuring other Managers are trained and comply with the GDPR in respect of Data Processing within their area of responsibility.
- Acting as the first point of call for Staff and personnel seeking clarification on any aspect of this policy. Compliance
 with the data protection legislation is the responsibility of all Staff of Rigby Morrison FM Ltd, who process personal
 and business data.

Data Protection Principles

Rigby Morrison FM Ltd policies and procedures are designed to ensure compliance with the data protection principles. These include:

- Personal and client business data must be processed lawfully, fairly, and transparently.
- Personal and client business data can only be collected for specific, explicit, and legitimate purposes
- Personal and client business data must be adequate, relevant, and limited to what is necessary for processing.



• Personal and client business data must be accurate and kept up to date with every effort to erase or rectify without delay.

Approval

This Policy, and the associated processes and procedures, are approved by the Managing Director on behalf of the Board as the authority for our Quality documents within the company.

Review

This policy will be monitored regularly and will be reviewed annually.

Signed:

Andrew Shepherd Managing Director Rigby Morrison FM Ltd

02 March 2025