



Data Protection & GDPR Policy

Document Details:

Company Name: Circularity Direct Ltd

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Responsible Body: Board of Directors

Approved By: Omer Kutluoglu, Managing Director

Introduction

Circularity Direct Ltd is committed to safeguarding personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy outlines our approach to the responsible collection, processing, storage, and security of personal data.

Key Principles

- Lawful, fair, and transparent processing of personal data.
- Data minimization to collect only the necessary information for business operations.
- Secure storage and restricted access to personal data to prevent unauthorized use.
- Ensuring accuracy and timely updates of stored personal data.
- Adherence to data retention policies and secure disposal of obsolete data.

Responsibilities

- Designation of a Data Protection Officer (if applicable) to oversee compliance.
- Employees must handle personal data responsibly and report any breaches immediately.
- Individuals have rights to access, rectify, and erase their data under GDPR regulations.
- Ensuring third-party service providers comply with GDPR requirements through appropriate contracts and agreements.

Security Measures

- Implementation of encryption, firewalls, and other cybersecurity measures to protect sensitive information.
- Regular audits and policy reviews to ensure ongoing compliance with data protection laws.
- Clear procedures for handling data subject access requests (DSARs) and reporting breaches.
- Strict controls on data access and retention policies to prevent unauthorized exposure.
- Mandatory training programs to educate employees on GDPR obligations and best practices.

Compliance & Review

- Compliance with the UK GDPR and Data Protection Act 2018.
- Periodic risk assessments to identify potential vulnerabilities in data protection.
- Transparent communication with individuals regarding how their data is used and stored.
- Regular updates to policies to reflect changes in legal and technological environments.

Approval:

Signed by: Omer Kutluoglu

Position: Managing Director

Date: 6th January 2025



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