

GDPR and Data Protection Policy

Introduction

This Data Protection Policy outlines how Stannp.com. ("we," "us," or "our") processes personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). We are committed to safeguarding the privacy and security of all personal data processed on behalf of our business clients and their customers.

Scope

This policy applies to:

- All employees, contractors, and third-party service providers who process personal data on behalf of Stannp.com.
- All personal data processed in any format, including electronic and paper records.
- All data processed as part of business-to-business (B2B) services, including the personal data of our clients' customers.

Definitions

- **Personal Data:** Any information that relates to an identified or identifiable individual.
- **Processing:** Any operation performed on personal data, such as collection, storage, use, or sharing.
- **Data Subject:** An individual whose personal data is processed, including customers of our business clients.
- **Data Controller:** Our business clients who determine the purposes and means of processing their customers' personal data.
- **Data Processor:** Stannp.com., acting on behalf of the data controller to process personal data.

Principles of Data Protection

Stannp adheres to the following principles in accordance with Article 5 of the UK GDPR:

1. **Lawfulness, Fairness, and Transparency:** We process personal data lawfully, fairly, and transparently.

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2. **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes and not processed further in a manner that is incompatible with those purposes.
3. **Data Minimisation:** We collect only the data necessary for the specified purpose.
4. **Accuracy:** We ensure data accuracy and keep it up to date.
5. **Storage Limitation:** Personal data is retained only for as long as necessary.
6. **Integrity and Confidentiality:** We implement appropriate technical and organisational measures to ensure data security.

Lawful Basis for Processing

When processing data on behalf of our business clients, we ensure that:

- The data controller has obtained the necessary lawful basis for collecting and processing personal data.
- Processing is conducted under a valid legal basis such as consent, contract performance, legal obligation, or legitimate interests.

Data Collection and Use

We process personal data provided by our business clients for the following purposes:

- Delivering direct mail and communication services as instructed by the data controller.
- Managing customer relationships on behalf of our clients.
- Facilitating targeted marketing campaigns.
- Complying with legal obligations.

Data Retention

We retain personal data only for as long as instructed by the data controller or necessary to fulfil the purposes for which it was collected. Data retention periods are reviewed regularly, and data is securely deleted when no longer required. Customers retain control of their data and are able to delete their data at any time. Data is segregated for each customer who have unique user ids to access their data.

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Data Transfer

Stannp will not transfer any personal data outside of the EEA unless the following conditions are fulfilled:

- the Customer or Stannp has provided appropriate safeguards in relation to the transfer
- the Data Subject (as defined in the Data Protection Legislation) has enforceable rights and effective legal remedies
- Stannp complies with its obligations under the Data Protection Legislation by providing an adequate level of protection to any Personal Data that is transferred
- Stannp complies with reasonable instructions notified in advance by the Customer with respect to the processing of the Personal Data

Rights of Data Subjects

We assist our business clients in responding to data subject requests under the UK GDPR. Data subjects have the following rights:

- **Right to Access:** Request access to personal data we process on behalf of the data controller.
- **Right to Rectification:** Request correction of inaccurate or incomplete data.
- **Right to Erasure:** Request deletion of personal data.
- **Right to Restrict Processing:** Request restriction of processing.
- **Right to Data Portability:** Receive personal data in a portable format.
- **Right to Object:** Object to processing based on legitimate interests.

Data Sharing and Third Parties

We may share personal data with third parties where necessary to deliver services or comply with legal obligations. We ensure that appropriate contractual safeguards are in place to protect personal data.

Data Security

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, loss, alteration, or destruction. Security measures include, but are not limited to:

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- Encryption of data both in transfer and at rest.
- Regular system audits and penetration testing.
- Access controls to restrict data access to authorised personnel only.

Data Breach Response

In the event of a data breach, we will take immediate action to mitigate risks and notify the Information Commissioner's Office (ICO), the data controller, and affected data subjects as required by law.

Accountability and Governance

We maintain detailed records of our data processing activities and conduct regular data protection impact assessments where necessary. Our Compliance team is responsible for overseeing compliance with this policy.

Training and Awareness

All employees and relevant stakeholders are trained on data protection principles and their responsibilities under the UK GDPR and DPA 2018.

Compliance

Where it is believed that an employee has failed to comply with this policy, they will face the company's disciplinary procedure. If the employee is found to have breached the policy, they will face a disciplinary penalty ranging from a verbal warning to dismissal. The actual penalty applied will depend on factors such as the seriousness of the breach and the employee's disciplinary record.

Policy Review

This policy is reviewed regularly by the Compliance and Operations Director and updated as necessary to reflect changes in legislation or business practices.

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Version History

Version	Version Date	Additions/Alterations	Initials
1.0	20/02/2020	First issue	LM
2.0	20/02/2024	Full review and amendments	LM
3.0	20/02/2025	Full review and amendments	LM

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