**Introduction**

NJR Tubular Solutions Ltd needs to gather and use certain personal information about individuals. This may include categories such as customers, suppliers, business contacts, employees; sub-contractors, professional advisers and others with whom it does business.

This Policy Statement describes how an individual’s personal data must be collected, handled and stored to meet its legal compliance obligations under the General Data Protection Regulation (GPDR).

This Data Protection Policy ensures that NJR Tubular Solutions Ltd

Complies with the requirements of the GDPR and best practice

* Protects the rights of all those whose personal information it processes
* Is transparent as to how it stores and processes an individual’s personal information
* Protects itself from the risk of breaching the requirements of the GDPR

**Protection of Personal Information**

A senior member of staff is appointed to advise company employees on the rules needed to ensure compliance with data protection laws and who to approach if they have any questions regarding its Data Protection Policy or anything related to the processing of personal information.

**Processing of Personal Information**

All Company employees are trained in the need to ensure security of personal information and in particular heads of departments who are those responsible for day-to-day control of personal information. These responsibilities and categories are clearly defined in separate documentation within its Quality Management System which complies with ISO 9001:2015.

**Processing Sensitive Personal Information**

Employees are aware of how to identify sensitive personal information and how to process it lawfully and according to this Policy.

**Subject Access Requests**

Subject access requests will be dealt with promptly and certainly within 1 month of the request. The information with be provided in a Personal Information Notice which will be in appropriate and clear language and will provide the information necessary for the enquirer to understand the nature and content of any personal information the Company retains on that individual.

**Breaches in Personal Information Protection**

All staff members have an obligation to report data protection breaches to a senior manager such as a director or to contact the ICO if they have concerns such as a breach. This will allow the appropriate personnel to investigate further and take the necessary steps to rectify the issue in a timely manner.

**Staff Training**

Employees are trained in data protection and the requirements of the GDPR and the actions they are required to undertake. Training is delivered to all employees upon induction into the Company and refresher training will be delivered regularly and any changes that to the requirements of the GDPR.

**Privacy Notice**

A privacy notice is published on the NJR Tubular Solutions Ltd’s website.

**Consequences of Failing to Comply With This Data Protection Policy**

The consequences of failing to comply with this Data Protection Policy and for any breaches of the GDPR may result in disciplinary action leading to dismissal.

This policy statement is reviewed annually and approved by the board of directors and communicated to any interested party.

Signed:

Nick Robins

Managing Director

For and on behalf of NJR Tubular Solutions Ltd

Dated: December 2022