

## Data protection policy (GDPR)

### Introduction

The General Data Protection Regulation (GDPR) regulates the way in which all personal data is held and processed. This is a statement of the data protection policy adopted by the Cara Group. It applies to all Cara Group employees.

In order to operate efficiently Cara Group needs to collect and use information about the people with whom we work. This includes current, past and prospective employees, reviewers, professional experts, stakeholders and others with whom we communicate.

Cara Group regards the lawful and correct treatment of personal information as integral to our successful operation, and to maintaining the confidence of the people we work with. To this end we fully endorse and adhere to the principles of the Regulations.

### Purpose

The purpose of this policy is to ensure that everyone handling personal information at Cara Group is fully aware of the requirements of GDPR and complies with data protection procedures and that data subjects are aware of their rights under the Regulations.

### Scope:

'Personal data' is essentially any recorded information which identifies a living individual. Personal data held by Cara Group will include contact information for a variety of stakeholders and other personal details.

### Responsibility for Cara Group's compliance with the Act

The Company's Data Protection Officer is [Lisa McLoughlin](#).

In addition, the Managing Director has overall responsibility for compliance and individual members of staff are responsible for the proper use of the data they process.

## **Policy statement**

### **The Company will ensure that personal information must:**

- be processed fairly and lawfully
- not be used for a purpose for which it was not collected
- be adequate, relevant and not excessive for the purpose
- be accurate and up-to-date
- not be kept longer than necessary
- be processed in accordance with GDPR
- be kept secure and protected from unauthorised processing, loss or destruction
- be transferred only to those countries outside the European Economic Area that provide adequate protection for personal information.

### **In order to meet the requirements of the principles Cara Group will:**

- fully observe conditions regarding the fair collection and use of information
- meet its legal obligations to specify the purposes for which information is used
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
- ensure the quality of the information used
- hold personal information on Cara Group systems for as long as is necessary for the relevant purpose, or as long as is set out in any relevant contract held with Cara Group.
- ensure that the rights of people about whom information is held can be fully exercised their rights (these include: the right to be informed that processing is being undertaken; the data subject's right of access to their personal information; the right to prevent processing in certain circumstances; the right to correct, rectify, block or erase information which is regarded as wrong information)
- take appropriate technical and organisational security measures to safeguard personal information and ensure that personal information is not transferred outside the EEA without suitable prior consent