

3. Lawful, fair and transparent processing

- To ensure its processing of data is lawful, fair and transparent, Callaghan Fencing & Gates shall maintain a Register of Systems.
- The Register of Systems shall be reviewed at least annually.
- Individuals have the right to access their personal data and any such requests made shall be dealt with in a timely manner.

4. Lawful purposes

- All data processed by Callaghan Fencing & Gates must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- Callaghan Fencing & Gates shall note the appropriate lawful basis in the Register of Systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Callaghan Fencing & Gates systems.

5. Data minimisation

- Callaghan Fencing & Gates shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- [Add considerations relevant to Callaghan Fencing & Gates particular systems]

6. Accuracy

- Callaghan Fencing & Gates shall take reasonable steps to ensure personal data is accurate.
- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- [Add considerations relevant to Callaghan Fencing & gates particular systems]

7. Archiving / removal

- To ensure that personal data is kept for no longer than necessary, Callaghan Fencing & Gates shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- Callaghan Fencing & gates shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Callaghan Fencing & Gates shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

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