



Data Protection Policy

1. Introduction

ESS Ltd recognises the importance of protecting personal data and is committed to ensuring compliance with applicable data protection laws and regulations.

This Data Protection Policy outlines our commitment to safeguarding personal data, including the collection, use, storage, and disposal of such data.

2. Scope

- This policy applies to all personal data processed by ESS Ltd, whether in electronic or physical form, and includes personal data of employees, clients, contractors, learners and other individuals with whom we interact.
- It covers all activities involving personal data, including collection, storage, processing, sharing, and disposal.

3. Principles of Data Protection

- ESS Ltd will adhere to the following key principles of data protection:
 - Lawfulness, fairness, and transparency: Personal data will be processed lawfully, fairly, and transparently, and individuals will be informed of the purposes and legal basis for processing their data.
 - Purpose limitation: Personal data will be collected and processed only for specified, explicit, and legitimate purposes.
 - Data minimisation: Personal data collected will be limited to what is necessary for the intended purpose and will be kept accurate and up to date.
 - Accuracy: Reasonable steps will be taken to ensure that personal data is accurate and, where necessary, kept up to date.
 - Storage limitation: Personal data will be stored only for as long as necessary to fulfil the purposes for which it was collected, and appropriate retention periods will be implemented.
 - Integrity and confidentiality: Personal data will be processed securely and protected against unauthorised or unlawful processing, accidental loss, destruction, or damage.
 - Accountability: ESS Ltd will take responsibility for complying with data protection laws and will be accountable for our data protection practices.

4. Data Collection and Use

- Personal data will be collected only for specified, legitimate purposes and processed in accordance with applicable data protection laws.



Exceeding Safety Standards

- Individuals will be provided with clear and transparent information regarding the collection and use of their personal data, including the legal basis for processing, and their rights in relation to their data.
- Personal data will be used solely for the purposes for which it was collected, unless the individual provides explicit consent or as required by law.

5. Data Security

- Appropriate technical and organisational measures will be implemented to ensure the security and confidentiality of personal data.
- Access to personal data will be restricted to authorised personnel on a need-to-know basis, and confidentiality obligations will be enforced.
- Regular security assessments and audits will be conducted to identify and address any potential vulnerabilities or breaches.

6. Data Sharing and Transfers

- Personal data will not be disclosed or shared with third parties unless there is a legitimate basis for doing so or with explicit consent from the individual.
- When sharing personal data with third parties, appropriate safeguards and data protection agreements will be in place to ensure the security and lawful processing of the data.
- Transfers of personal data to countries outside the European Economic Area (EEA) will comply with applicable data protection laws and will be subject to appropriate safeguards.

7. Individual Rights

- ESS Ltd acknowledges and respects the rights of individuals in relation to their personal data, including the right to access, rectify, erase, restrict processing, and object to processing.
- Requests from individuals to exercise their data protection rights will be handled promptly and in accordance with applicable laws.
- ESS Ltd will provide individuals with mechanisms to exercise their rights and will maintain records of any data subject requests and our responses.

8. Data Breach Management

- ESS Ltd will implement procedures to detect, investigate, and respond to data breaches in a timely and appropriate manner.
- In the event of a data breach, affected individuals and relevant authorities will be notified as required by applicable data protection laws.



Exceeding Safety Standards

9. Monitoring and Review

- ESS Ltd will regularly monitor and review our data protection practices to ensure compliance with applicable laws and regulations.
- This policy will be reviewed periodically and updated as necessary to reflect changes in legal requirements or our data processing activities.

10. Communication

- This Data Protection Policy will be communicated through our website.
- Any questions or concerns regarding data protection should be directed to Lorna McBreen, CEO.

At ESS Ltd, we are committed to protecting personal data and respecting the privacy rights of individuals. This Data Protection Policy outlines our commitment to comply with applicable data protection laws, ensuring the confidentiality, integrity, and security of personal data throughout our organisation. By implementing robust data protection measures and fostering a culture of privacy awareness, we aim to maintain the trust and confidence of our employees, clients, and stakeholders.

Lorna McBreen

Lorna McBreen, CEO

15.07.2023

Date