



## UK GDPR Compliance Policy

Manuscript Pen Company Ltd is the 'data controller', under the terms of all relevant legislation, and is committed to comply with UK GDPR in the following ways:

- Personal data is processed lawfully, fairly, and transparently.
- Data is collected only for specified, explicit, and legitimate purposes.
- Only the minimum necessary personal data is collected and processed.
- Personal data is kept accurate and up to date.
- Data is retained only for as long as necessary for the intended purpose.
- Appropriate security measures protect personal data from unauthorised access, loss, or damage.
- A clear and accessible privacy policy explains how personal data is used.
- A lawful basis for processing customer data is established and documented.
- Individuals are informed of their rights, including access, correction, and deletion of their data.
- Employee personal data is stored securely and access is limited to authorised personnel.
- A data retention policy governs the storage and deletion of HR records.
- International data transfers comply with UK GDPR and, where applicable, EU GDPR.
- Data shared with overseas suppliers is protected through adequacy decisions, Standard Contractual Clauses (SCCs), or Binding Corporate Rules (BCRs).
- Website cookie usage complies with UK GDPR, and user consent is obtained where required.
- Marketing communications follow GDPR requirements, ensuring consent or legitimate interest before sending emails.
- A data breach response plan is in place to detect, report, and respond to incidents.
- Personal data breaches are reported to the ICO within 72 hours if there is a risk to individuals.
- A Data Protection Lead is responsible for overseeing GDPR compliance.
- Data Protection Impact Assessments (DPIAs) are conducted for high-risk data processing activities.
- Supplier contracts include GDPR-compliant clauses to ensure secure data handling.
- Employees receive regular training on data protection responsibilities.
- Regular audits and security reviews ensure compliance with GDPR requirements.

Signed on behalf of the Company

Charles Stockbridge

**Managing Director & The Data Protection Officer (DPO)**

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