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## Company Policy Statement: **Data Protection Policy**

Portfolio: Governance and Assurance  
Portfolio Director: Mr Roger Clarke

Document Reference: GRAAY\POL\DOC\2023\DataProtection\Rev.12.0509][4

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Author: Mr Roger Clarke



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## DOCUMENT ETYMOLOGY

### Title

Policy Statement for	Portfolio
Data Protection Policy	Governance and Assurance

### Responsibility

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### Approver

Title	Name	Date
Chief Executive Officer	Mr Frank Lloyd-Murray	Wednesday, 21 June 2023

### Distribution

Name	Business Area	Reason and Use
Director (Project Management)	Senior Leadership	Sign-Off and Acceptance
Director (ASURRA Operations)	Senior Leadership	Sign-Off and Acceptance
Director (Signalling Operations)	Senior Leadership	Sign-Off and Acceptance
Director (Rail Infrastructure)	Senior Leadership	Sign-Off and Acceptance
Director (Business Development)	Senior Leadership	Sign-Off and Acceptance
Director (Governance and Assurance)	Senior Leadership	Sign-Off and Acceptance
Director (Media Operations)	Senior Leadership	Sign-Off and Acceptance



# Section: 2 – The Policy Statement

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## What exactly is a Policy Statement?

A policy statement is an organization-level document that prescribes acceptable methods or behaviours. Essentially, a policy is simply the way things are done within an organization.

Policies are different from procedures and standard operating procedures because they are applicable to an entire organization and are primarily intended to set direction.



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## DATA PROTECTION POLICY STATEMENT

During the course of our activities we, GRAAY<sup>®</sup> Limited, will process personal data (which may be held on paper, electronically, or otherwise) about our staff and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 1998 (DPA). The purpose of this policy is to make you aware of how we will handle your personal data.

"Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, and expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying, or using the data in any way.

We will usually only process your personal data where you have given your consent or where the processing is necessary to comply with our legal obligations. In other cases, processing may be necessary for the protection of your vital interests, for our legitimate interests or the legitimate interests of others. The full list of conditions is set out in the Data Protection Act 1998 (DPA).

We will only process "sensitive personal data" about ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sex life, criminal proceedings, or convictions, where a further condition is also met. Usually this will mean that you have given your explicit consent, or that the processing is legally required for employment purposes. The full list of conditions is set out in the Data Protection Act 1998 (DPA).

We will keep the personal data we store about you accurate and up to date. Data that is inaccurate or out of date will be destroyed. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data, we hold about you.

We will not keep your personal data for longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems when it is no longer required.

You have the right to: Request access to any personal data we hold about you, prevent the processing of your data for direct-marketing purposes, ask to have inaccurate data held about you amended, prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.

This policy will be regularly reviewed by GRAAY<sup>®</sup> Limited to ensure that they are adequate and continue to satisfy business requirements. This policy will be reviewed and updated as required at least but not limited to once every 12 months.

Signed as Approved this day, Wednesday, 21 June 2023

Signature

Position

**Mr Frank Lloyd-Murray**  
**Chief Executive Officer**

