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| | FEI.POL.1.12 | 1 | DATA PROTECTION & GDPR POLICY | AJ | 29/01/2024 |

FEI Foods Ltd Data Protection and GDPR Policy

FEI Foods Ltd. recognizes the importance of protecting the privacy and security of personal data. This Data Protection and GDPR Compliance Policy outlines our commitment to complying with data protection laws, including the General Data Protection Regulation (GDPR), and establishes guidelines for the responsible handling of personal information, with specific detail on the procedure contained within our staff handbook:

- **Leadership Commitment:** We are committed to protecting the privacy and security of personal data in compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR). The head of human resources is responsible for the fulfilment of this policy with heads of department accountable for delivery.
- **Data Collection and Processing:** We will clearly define the purposes for collecting and processing personal data and obtain explicit consent from individuals when required by law.
- **Lawful Basis for Processing:** We will identify and document the lawful basis for processing personal data, highlighting whether processing is necessary for the performance of a contract, compliance with legal obligations, consent, or other legitimate purposes, ensure compliance with the GDPR's principles.
- **Data Minimisation and Accuracy:** The collection of personal data will be minimised to what is necessary for the intended purposes, and we will regularly review and update data to ensure accuracy and relevance, taking steps to rectify or erase inaccurate data promptly.
- **Security Measures:** Robust security measures will be implemented to protect personal data from unauthorised access, disclosure, alteration, and destruction, and will include measures such as encryption and access controls. Penetration testing for ensuring no unauthorised external access.
- **Data Subject Rights:** Respect and uphold the rights of data subjects, including the right to access, rectify, erase, restrict processing, and data portability whilst establishing procedures for handling and responding to data subject requests within the timelines mandated by the GDPR.
- **International Data Transfers:** Ensure that international transfers of personal data comply with GDPR requirements, assessing the adequacy of data protection in the destination country.
- **Data Protection Impact Assessments (DPIAs):** Conduct DPIAs for high-risk processing activities that may result in a high risk to the rights and freedoms of individuals. Document the assessment, mitigate risks, and seek approval from the Data Protection Officer or relevant authority if required.
- **Training and Awareness:** Provide regular training to relevant stakeholders on data protection principles, GDPR compliance, and the importance of safeguarding personal data, whilst fostering a culture of awareness and accountability within the organisation.

Commitment, motivation, and involvement of each employee from the top down is the guarantee for the success of this policy.

Signed:



Simon Lewis
Managing Director

Date:

29/1/24

Signed:



Aled Jones
Head of HR

Date:

29/1/24