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Authorised: Mark Farthing	Effective date: 09/2021	Issue: 02

IP46 – Data Protection Policy

1. Introduction

This Policy sets out the obligations of Real Group Ltd. (“RG”) regarding data protection and the rights of current staff members (including employees, interns and volunteers), ex-staff members, current delegates, previous delegates, prospective staff members, prospective delegates, shoppers, current service users, previous service users, directors, consultants, agents, customers and suppliers (“all the aforementioned are data subjects”) in respect of their personal data under the General Data Protection Act 2018 (“the Regulation”) and Privacy and Electronic Communications Regulation (PECR).

The Regulation defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by RG, its employees, agents, contractors, interns, volunteers or other parties working on behalf of RG.

RG is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, security of data and privacy of all individuals with whom it deals.

2. The Data Protection Principles

This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:

- processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be

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processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;

- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2.1 Lawful, Fair, and Transparent Data Processing

The Regulation seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulation states that processing of personal data shall be lawful if at least one of the following applies:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

2.2 Processed for Specified, Explicit and Legitimate Purposes

- a) RG collects and processes the personal data set out in the Real Group Data Inventory Schedule (data map). This does include personal data received directly from data subjects (for example, contact details used when a data subject communicates with us) and data received from third parties (for example, where a university passes data to us).
- b) RG only processes personal data set out in Real Group's Data Inventory Schedule (data map). The purposes for which we process personal data is communicated to data subjects at the time that their personal data is collected (by directing them to our Privacy Policy and Cookies Policy on our website at <http://www.realgroup.co.uk/>), where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

2.3. Adequate, Relevant and Limited Data Processing

RG will only collect and process personal data for and to the extent necessary for

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the specific purpose(s) informed to data subjects as under 2.2 above.

2.4. Accuracy of Data and Keeping Data Up to Date

RG shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at regular intervals thereafter. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

2.5. Timely Processing

RG shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay.

2.6. Secure Processing

RG shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in the Real Group privacy policy, data breach and incident management procedure, information security policy, information, technology and computer use policy, data subject access request procedure and the secure disposal of information assets and hardware procedure.

3. Accountability

- 3.1) RG's Data Manager is Mr. Mark Farthing of Real Group Ltd, 70-72 Stour Street, Canterbury, CT1 2NZ, United Kingdom.
- 3.2) RG shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
 - a) The name and details of RG, its Data Manager, and any applicable third party Data Managers;
 - b) The purposes for which RG processes personal data;
 - c) Details of the categories of personal data collected, held, and processed by RG; and the categories of data subject to which that personal data relates
(Please see Appendix B for our Data Asset Inventory Schedule);
 - d) Details (and categories) of any third parties that will receive personal data from Real Group;
 - e) Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
 - f) Details of how long personal data will be retained by RG (Please see Appendix C for our Retention Table); and

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g) Detailed descriptions of all technical and organisational measures taken by RG to ensure the security of personal data.

4. Privacy Impact Assessments

RG shall carry out Privacy Impact Assessments when and as required under the Regulation. Privacy Impact Assessments shall be overseen by our Data Manager Mr. Mark Farthing and shall address the following areas of importance:

- 4.1) The purpose(s) for which personal data is being processed and the processing operations to be carried out on that data;
- 4.2) Details of the legitimate interests being pursued by RG;
- 4.3) An assessment of the necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
- 4.4) An assessment of the risks posed to individual data subjects; and
- 4.5) Details of the measures in place to minimise and handle risks including safeguards, data security, and other measures and mechanisms to ensure the protection of personal data, sufficient to demonstrate compliance with the Regulation (Please see Appendix D for a copy of our Privacy Impact Assessment Template).

5. Data Subject Rights

The Regulation sets out the following rights applicable to data subjects:

- a) The right to be informed;
- b) The right of access;
- c) The right to rectification;
- d) The right to erasure (also known as the 'right to be forgotten');
- e) The right to restrict processing;
- f) The right to data portability;
- g) The right to object;
- h) Rights with respect to automated decision-making and profiling.

6. Keeping Data Subjects Informed

- 6.1) RG shall ensure that the following information is provided - by reference to its Privacy Policy - to every data subject when personal data is collected:
 - a) Details of Real Group including, but not limited to, the identity of Mr. Mark Farthing, its Data Manager;
 - b) The purpose(s) for which the personal data (as detailed in Part 15 of this

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Policy) is being collected and will be processed and the legal basis justifying that collection and processing;

- c) Where applicable, the legitimate interests upon which RG is justifying its collection and processing of the personal data;
- d) Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
- e) Where the personal data is to be transferred to one or more third parties, details of those parties;
- f) Details of the length of time the personal data will be held by RG (or, where there is no predetermined period, details of how that length of time will be determined Please see Appendix C for our Retention Table);
- g) Details of the data subject’s rights under the Regulation;
- h) Details of the data subject’s right to withdraw their consent to RG’s processing of their personal data at any time;
- i) Details of the data subject’s right to complain to the Information Commissioner’s Office (the ‘supervisory authority’ under the Regulation);
- j) Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it;
- k) Details of any automated decision-making that will take place using the personal data (including but not limited to profiling), including information on how decisions will be made, the significance of those decisions and any consequences.

6.2) The information set out above in Part 6.1 shall be provided to the data subject at the following applicable time:

6.2.1) Where the personal data is obtained from the data subject directly, at the time of collection (Links to our Privacy Policy on our website is available in the footer of all outbound communications from RG servers);

6.2.2) Where the personal data is not obtained from the data subject directly (i.e. from another party- Joint Controller Agreements are in place with third parties):

- a) If the personal data is used to communicate with the data subject, at the time of the first communication; or
- b) If the personal data is to be disclosed to another party, before the personal data is disclosed; or
- c) In any event, not more than one month after the time at which RG obtains the personal data.

7. Data Subject Access

7.1) A data subject may make a subject access request (“SAR”) at any time to find out more about the personal data which RG holds about them. RG is normally required to respond to SARs within one month of receipt (this can be extended by

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up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension). Please see Appendix E for the Subject Access Request policy and procedures in RG.

- 7.2) All subject access requests received must be forwarded to the Data Manager, Mr. Mark Farthing of Real Group Ltd (mark.farthing@realgroup.co.uk), 70-72 Stour Street, Canterbury, CT1 2NZ, United Kingdom.
- 7.3) RG does not charge a fee for the handling of normal SARs. Real Group reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

8. Rectification of Personal Data

- 8.1) If a data subject informs RG that personal data held by RG is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject's notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).
- 8.2) In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

9. Erasure of Personal Data

- 9.1) Data subjects may request that RG erases the personal data it holds about them in the following circumstances:
 - a. It is no longer necessary for RG to hold that personal data with respect to the purpose for which it was originally collected or processed;
 - b. The data subject wishes to withdraw their consent to RG holding and processing their personal data;
 - c. The data subject objects to RG holding and processing their personal data (and there is no overriding legitimate interest to allow RG to continue doing so) (see Part 12 of this Policy for further details concerning data subjects' rights to object);
 - d. The personal data has been processed unlawfully;
 - e. The personal data needs to be erased in order for RG to comply with a particular legal obligation
- 9.2) Unless RG has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension). The person's details will be logged in the GDPR Compliance Log for the ICO to make sure they will never be contacted again and also to demonstrate to the ICO that the 'Right to Erasure' has been upheld and actioned in a timely manner.
- 9.3) In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be

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informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

10. Restriction of Personal Data Processing

- 10.1) Data subjects may request that RG ceases processing the personal data it holds about them. If a data subject makes such a request, RG shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.
- 10.2) In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

11. Data Portability

- 11.1) RG processes personal data using electronic means to protect the environment.
- 11.2) Where data subjects have given their consent to RG to process their personal data in such a manner or the processing is otherwise required for the performance of a contract between RG and the data subject, data subjects have the legal right under the Regulation to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other Data Managers, e.g. other organisations).
- 11.3) To facilitate the right of data portability, RG shall make available all applicable personal data to data subjects in the following formats:
 - a) CSV files;
 - b) PDF files
- 11.4) Where technically feasible, if requested by a data subject, personal data shall be sent directly to another Data Manager.
- 11.5) All requests for copies of personal data shall be complied with within one month of the data subject's request (this can be extended by up to two months in the case of complex requests in the case of complex or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

12. Objections to Personal Data Processing

- 12.1) Data subjects have the right to object to RG processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling), and processing for scientific and/or historical research and statistics purposes.
- 12.2) Where a data subject objects to RG processing their personal data based on its legitimate interests, RG shall cease such processing forthwith, unless it can be demonstrated that RG's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.
- 12.3) Where a data subject objects to RG processing their personal data for direct marketing purposes, RG shall cease such processing forthwith.
- 12.4) Where a data subject objects to RG processing their personal data for scientific

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and/or historical research and statistics purposes, the data subject must, under the Regulation, 'demonstrate grounds relating to his or her particular situation'. RG is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

13. Automated Decision-Making

- 13.1) In the event that RG uses personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on data subjects, data subjects have the right to challenge to such decisions under the Regulation, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from RG.
- 13.2) The right described in Part 13.1 does not apply in the following circumstances: a) The decision is necessary for the entry into, or performance of, a contract between RG and the data subject; b) The decision is authorised by law; or c) The data subject has given their explicit consent.

14. Profiling

Where RG uses personal data for profiling purposes, the following shall apply:

- a) Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- b) Appropriate mathematical or statistical procedures will be used;
- c) Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- d) All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling (see Parts 16 and 17 of this Policy for more details on data security and RG's IT Policies: "Information Technology and Computer Use Policy" and "Information Security Policy" and also "IP28 Statement of Applicability").

15. Personal Data

The following personal data may be collected, held, and processed by RG:

- 15.1) For staff members:

First name, second name, CV, marital status, passport copy, immigration status, National Insurance number, P45/P46/P60 forms, professional/educational records, references, medical records such as disability, home address, phone number, e-mail address, next of kin and protected characteristics from prospective/current staff members including employees, interns and volunteers and bank details of current staff; This information is collected by RG as this is part

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of the employees terms of employment.

15.2) For delegates:

- A form photo identification document, full name, full contact details, application form; protected characteristics, job title, place of work, work contact details, educational achievements, other circumstantial information you may volunteer to us as pieces of evidence to support a mitigating circumstances claim, professional qualifications of past, current and prospective delegates; This information is collected to ascertain suitability for the course, along with enrolment with Middlesex University.
- First name, second name, company address, company phone number, bank details for invoices to contractors, suppliers and agents; This information is collected to ensure we can supply the delegate with the correct invoice.
- First name, second name, e-mail address, home address, phone number, level of qualification and bank details of current/previous shop customers; This information is collected to check shop materials are sold to appropriate customers and they can be supplied invoices/make payment.
- First name, second name, job title (position), possibly level and type of qualifications, company address, company/personal e-mail address and company/personal phone number of corporate contacts including contact persons who could lead to marketing or future customer building relationships; This information is collected to market future courses (provided they opt into this).
- Social media accounts information of prospective, current and former delegates and customers on platforms such as Facebook, Twitter and LinkedIn with their consent. This is to provide customers with updates via our social media platforms.

16. Data Protection Measures

RG shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data:

- a) All emails containing personal data must be encrypted;
- b) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hard copies should be shredded.
- c) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- d) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- e) Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using Royal Mail recorded delivery or an equivalent recorded delivery postal service;

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- f) No personal data may be shared informally and if an employee, intern, volunteer, agent, subcontractor, or other party working on behalf of RG requires access to any personal data that they do not already have access to, such access should be formally requested from the Data Manager, Mr. Mark Farthing.
- g) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
- h) No personal data may be transferred to any employees, interns, volunteers, agents, contractors, or other parties, whether such parties are working on behalf of RG or not, without the authorisation of the Data Manager, Mr. Mark Farthing;
- i) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, interns, volunteers, agents, sub-contractors or other parties at any time;
- j) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- k) All personal devices used for Real Group's work should be listed and reported to the Data Manager in accordance with Real Groups' internal mobile device policy;
- l) All personal data stored electronically should be encrypted and backed up at least weekly with back-ups stored offsite;
- m) All electronic copies of personal data should be stored securely using passwords and data encryption;
- n) All passwords used to protect personal data should be selected in accordance with the Password Policy as embedded in the IT Policy.
- o) Under no circumstances should any passwords be written down or shared between any employees, interns, volunteers, agents, contractors, or other parties working on behalf of RG, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method depending on the service you are using;
- p) Where personal data held by RG is used for Marketing and Public Relation purposes, it shall be the responsibility of Amanda Woolf, Head of Sales and Marketing to ensure that no data subjects have added their details to any marketing preference databases including, but not limited to, the Telephone Preference Service, the Mail Preference Service, the Email Preference Service, and other platforms such as Social Media accounts and SMS. Such details should be checked at least annually.

17. Organisational Measures

RG shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- a) All employees, interns, volunteers, agents, contractors, or other parties working on behalf of RG shall be made fully aware of both their individual responsibilities and RG's responsibilities under the Regulation and under this Policy, and shall be

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- provided with a copy of this Policy;
- b) Only employees, interns, volunteers, agents, sub-contractors, or other parties working on behalf of RG that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by RG;
 - c) All employees, interns, volunteers, agents, contractors, or other parties working on behalf of RG handling personal data will be appropriately trained to do so;
 - d) All employees, interns, volunteers, agents, contractors, or other parties working on behalf of RG handling personal data will be appropriately supervised;
 - e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed;
 - f) The performance of those employees, interns, volunteers, agents, contractors, or other parties working on behalf of RG handling personal data shall be regularly evaluated and reviewed;
 - g) All employees, interns, volunteers, agents, contractors, or other parties working on behalf of RG handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;
 - h) All agents, contractors, or other parties working on behalf of RG ('Data Processors') or work jointly with RG ('Joint Controllers') handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of RG arising out of this Policy and the Regulation. Please see Appendix F for a copy of RG's Data Processor Agreement Template and Appendix I for a copy of RG's Joint Controller Agreement Template;
 - i) The Data Protection Act 2018 binds all organisations that process personal data according to the 'processing' and 'personal data' definition in the aforementioned Act. Whether those Data Processors or Joint Controllers sign any Data processor or Joint Controller Agreement or not, it is nevertheless a binding legal obligation and breaches are subject to measures defined by the Act.
 - j) Where any agent, contractor or other party working on behalf of RG handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless RG against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

18. Data Breach Notification

- 18.1) All personal data breaches must be reported immediately to RG's Data Manager, Mr. Mark Farthing.
- 18.2) If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Manager must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- 18.3) In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the RG's Data Manager, Mr. Mark Farthing must ensure that all affected data subjects are informed of the breach directly

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and without undue delay.

18.4) Data breach notifications shall include the following information:

- a) The categories and approximate number of data subjects concerned;
- b) The categories and approximate number of personal data records concerned;
- c) The name and contact details of RG’s Data Manager, Mr. Mark Farthing (or other contact point where more information can be obtained);
- d) The likely consequences of the breach;
- e) Details of the measures taken, or proposed to be taken, by RG to address the breach including, where appropriate, measures to mitigate its possible adverse effects. Please see Appendix G for a sample of Internal Breach Report form and Appendix H for an External Breach form sample.

19. General Training

RG is responsible for ensuring that all of its employees, volunteers, interns, and contractors are aware of their personal responsibilities in relation to personal data, ensuring that it is properly protected at all times and is processed only in line with RG’s procedures.

To this end, RG shall ensure that all of its employees, interns, contractors and volunteers are given appropriate and relevant training. This training is “GDPR Essentials Training” and is delivered by iHASCO.

20. Implementation of Policy

This Policy shall be implemented as of 17 December 2020. The effective date of this policy is the date of last review. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This policy is also related to the following policies and procedures.

- The Real Group Privacy Policy,
- Data Breach and Incident Management Procedure,
- Information Security Policy,
- Information, Technology and Computer use Policy,
- Data subject access request procedure and the secure disposal of information assets and hardware procedure.

Data Protection Officer

Real Group recently, November 2020, appointed an independent Data Protection Officer (DPO), Tom Ziemski of Sampson Hall and we are reviewing and updating our policies and procedures. Mark Farthing, Data Manager, liaises closely with the DPO and Real Group’s management team have been made aware of their responsibilities to liaise with Mark and Tom to monitor risks relating to existing and new procedures that involve processing

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data.

This Policy has been approved and authorised by:

Name: Dr. Mark Turner

Signature:



Position: Managing Director

Date: 19 October 2022