

## Data Protection Policy

The EU General Data Protection Regulation (GDPR) came into effect in the UK on 25 May 2018. This affects how we collect and process personal data.

Personal data is any information related to a natural person, or 'Data Subject', that can be used to directly or indirectly identify the person. It can be anything from a name, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer IP address.

Southern Green Ltd is a landscape architectural practice delivering the provision of landscape architectural services throughout the UK encompassing landscape design and assessment for a range of sectors incorporating play, sports, holiday and leisure facilities, housing, commercial, educational and healthcare settings, public realm design, and restoration of historic parks and landscapes. The company offers services in the UK and exercises overall control of the purpose and means of the processing of personal data. Southern Green Ltd is therefore defined as both a 'Data Controller' and a 'Data Processor' under GDPR legislation.

The company is not required to employ a dedicated Data Protection Officer (DPO) because we are not a public authority, we do not monitor people systematically as part of our core business and we do not carry out large-scale processing of special categories of data listed under Articles 9 and 10.

Southern Green Ltd commits to:

- **Lawfulness, fairness and transparency** — data processing is always lawful, fair, and transparent to the data subject
- **Purpose limitation** — data is processed for the legitimate purposes specified explicitly to the data subject when we collected it
- **Data minimization** — data is collected and processed only as much as is absolutely necessary for the purposes specified
- **Accuracy** — personal data is always accurate and up to date
- **Storage limitation** — we only store personally identifying data for as long as necessary for the specified purpose
- **Integrity and confidentiality** — data processing is done in such a way as to ensure appropriate security, integrity, and confidentiality (e.g. by using encryption)
- **Accountability** — the company, as data controller, is responsible for being able to demonstrate GDPR compliance with all of these principles

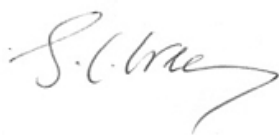
Southern Green Ltd takes the following steps to ensure compliance with the above:

- Ensures that all personal information is stored digitally on our network, password protection where required, and deleted once surplus to requirements
- Ensures that all hard copies of information containing personal data are shredded once surplus to requirements
- Reviews this policy and our staff handbook on an annual basis, to ensure our approach to data protection remains compliant with the latest legislation
- Communicates this policy to staff, clients and sub-contractors
- Undertakes regular staff training to keep staff up to date with our IMS system, including roles and responsibilities under GDPR

Data is only collected and processed by Southern Green Ltd where one of the following reasons applies:

- The data subject has given us unambiguous consent to do so
- Where necessary to execute or enter into a contract
- Where required to comply with a legal obligation
- Where required to save somebody's life
- Where needed to perform a task in the public interest
- Where we have a legitimate interest

**Simon Green**  
Director



**Ros Southern**  
Director



**Liam Haggarty**  
Director

