

At **Hedging Plants Direct**, we are committed to protecting the privacy and data of our customers, employees, and stakeholders. This GDPR Data Protection Policy outlines our approach to ensuring compliance with the General Data Protection Regulation (GDPR) and safeguarding personal data within our organization.

Data Protection Principles

- a. **Lawfulness, Fairness, and Transparency:** We process personal data lawfully, fairly, and transparently, ensuring individuals are informed about the collection and use of their data.
- b. **Purpose Limitation:** We only collect and process personal data for specified, explicit, and legitimate purposes.
- c. **Data Minimization:** We ensure that personal data processed is adequate, relevant, and limited to what is necessary for the intended purpose.
- d. **Accuracy:** We take reasonable steps to ensure that personal data is accurate and kept up to date.
- e. **Storage Limitation:** We retain personal data for the necessary period required to fulfill the intended purpose or as required by law.
- f. **Integrity and Confidentiality:** We implement appropriate security measures to protect personal data against unauthorized access, loss, destruction, or damage.
- g. **Accountability:** We take responsibility for our data processing activities and demonstrate compliance with GDPR principles.

Data Collection and Processing

- a. **Consent:** We obtain and document consent from individuals for the collection and processing of their personal data, clearly stating the purpose and scope of processing.
- b. **Lawful Basis:** We ensure that data processing activities have a lawful basis, such as the necessity for the performance of a contract, compliance with legal obligations, protection of vital interests, consent, or legitimate interests.
- c. **Data Minimization:** We collect only the necessary personal data required to fulfill the intended purpose and ensure it is relevant, accurate, and up to date.
- d. **Special Category Data:** If we process special category data (sensitive data), such as health information, we obtain explicit consent or rely on other legitimate bases as specified by GDPR.
- e. **Children's Data:** We do not knowingly process personal data of individuals under the age of 16 without appropriate parental consent.

Data Subject Rights

- a. **Access:** We respect individuals' right to access their personal data, allowing them to request and obtain information about the processing activities concerning their data.
- b. **Rectification:** We promptly rectify or update any inaccurate or incomplete personal data upon request.
- c. **Erasure:** We honour individuals' right to have their personal data erased (right to be forgotten) when certain conditions specified by GDPR are met.
- d. **Restriction of Processing:** We restrict the processing of personal data when requested by the data subject or as required by GDPR.
- e. **Data Portability:** We provide individuals with the ability to receive their personal data in a commonly used and machine-readable format, allowing them to transmit it to another organization when requested.
- f. **Objection to Processing:** We respect individuals' right to object to the processing of their personal data, unless we have compelling legitimate grounds for continued processing.

g. Automated Decision-Making: We do not engage in automated decision-making processes, including profiling, that significantly affect individuals without their explicit consent.

Data Security and Retention

- a. Security Measures: We implement appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, alteration, or destruction. These measures include encryption, access controls, regular system updates, and staff training.
- b. Data Breach Response: In the event of a data breach, we have procedures in place to detect, report, and respond to the breach promptly and in compliance with GDPR requirements.
- c. Data Retention: We retain personal data for as long as necessary to fulfill the purposes for which it was collected, or as required by legal or regulatory obligations.

Third-Party Processing

- a. Data Processors: When engaging third-party data processors to handle personal data on our behalf, we ensure that they provide sufficient guarantees of implementing appropriate technical and organizational measures to protect the data.
- b. Data Transfers: If personal data is transferred to countries outside the European Economic Area (EEA), we ensure appropriate safeguards are in place as required by GDPR.

Employee Awareness and Training

- a. We provide regular training and awareness programs to our employees to ensure they understand their responsibilities in handling personal data and comply with GDPR requirements.

Compliance and Review

- a. We regularly review and update our GDPR Data Protection Policy to reflect changes in our business operations, legal requirements, and best practices.
- b. We maintain records of our data processing activities, including data mapping, data protection impact assessments, and consent management.

By implementing this GDPR Data Protection Policy, we affirm our commitment to protecting personal data and ensuring compliance with GDPR. We hold ourselves accountable for upholding the principles and obligations outlined in this policy.



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