



P O L I C Y 0 3 O F 1 6

Privacy, Data Protection & GDPR Policy

Real partnership. Real expertise.

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Policy owner	Adam O'Neill, Director
Approved by	Stevie MacGregor
Classification	Public — available on request

SOMA Project Controls Ltd
www.somaprojectcontrols.com

1. Purpose

This policy sets out how SOMA Project Controls Ltd collects, uses, stores and protects personal data in line with the UK GDPR, the Data Protection Act 2018 and — where applicable — the EU GDPR. It explains our commitments to the individuals whose data we hold and the responsibilities of our people.

2. Scope

This policy applies to all personal data processed by SOMA in any form, whether relating to employees, associates, clients, prospects, suppliers or members of the public.

3. Data Protection Principles

We process personal data in accordance with the following principles:

- Lawfulness, fairness and transparency.
- Purpose limitation — data is collected for specified, explicit and legitimate purposes.
- Data minimisation — we collect only what is necessary.
- Accuracy — data is kept up to date and corrected without delay where inaccurate.
- Storage limitation — data is kept no longer than necessary.
- Integrity and confidentiality — data is protected against unauthorised or unlawful processing and accidental loss.
- Accountability — we can demonstrate our compliance.

4. Lawful Basis

We only process personal data where we have an identified lawful basis — most commonly contract, legitimate interests, legal obligation, or consent. The basis is recorded in our Record of Processing Activities (ROPA).

5. Data Subject Rights

Individuals have the right to be informed, to access their data, to rectification, erasure, restriction, portability, objection, and rights relating to automated decision-making. Requests are acknowledged without delay and fulfilled within one calendar month, extendable where genuinely complex.

6. Technical & Organisational Measures

- All laptops and mobile devices are encrypted at rest.
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- Multi-factor authentication is mandatory for cloud services handling personal data.
- Access is granted on a least-privilege, need-to-know basis and reviewed quarterly.
- Personal data is segregated from client project data where feasible.
- Paper records are kept in locked storage and are securely destroyed on disposal.

7. Data Processors & International Transfers

Where SOMA uses third-party processors (for example cloud hosting, payroll or IT support) we have written contracts containing the clauses required by UK GDPR Article 28. International transfers outside the UK are made only with appropriate safeguards in place, such as adequacy regulations or the International Data Transfer Agreement.

8. Data Breach Response

Actual or suspected personal data breaches must be reported internally within 24 hours. Reportable breaches are notified to the Information Commissioner's Office within 72 hours of awareness, and to affected individuals without undue delay where the breach is likely to result in a high risk to their rights and freedoms.

9. Retention

Personal data is retained only for as long as necessary for the purpose for which it was collected, or as required by law. Retention periods are set out in the Retention Schedule held by the Director.

10. Training & Accountability

All personnel receive data-protection training on induction and annually thereafter. The Director is the senior individual accountable for data protection; operational responsibility can be delegated but accountability is not.

11. Contact

Privacy queries, rights requests and complaints can be raised by emailing privacy@somaprojectcontrols.com. Individuals also have the right to complain to the Information Commissioner's Office at ico.org.uk.

12. Review & Governance

This policy is reviewed at least annually, and sooner if legislation, SOMA Project Controls Ltd's operating context or client requirements change materially. The Director is the accountable owner. Minor amendments are logged in the version-control table; material changes trigger a re-issue and fresh sign-off by the policy owner and approver named on the sign-off page.

S I G N E D & A P P R O V E D

Policy Adoption & Approval

This policy is formally adopted by SOMA Project Controls Ltd. It is communicated to all employees, associates and, where relevant, supply-chain partners, and is available on request to clients, prospective clients and other interested parties. The signatures below record its adoption and the date from which it takes effect.

P O L I C Y O W N E R

Adam O'Neill

Adam O'Neill

Director

SOMA Project Controls Ltd

Date: March 2026**A P P R O V E D B Y**

Stevie MacGregor

Stevie MacGregor

Director

SOMA Project Controls Ltd

Date: March 2026**N e x t s c h e d u l e d r e v i e w****March 2027**