



# Data Protection Policy

GDPR Compliant

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Title	Data Protection Policy
Reference	GDPR Compliant
Date	04/05/2018
Issue	V1.00

## REVISION HISTORY

Issue	Date	Author	Authorised	Remarks
Draft	08/02/2018	Tony Coates	Chris Green	For initial review and comment.
V1.0	14/03/2018	Colin Theaker	Chris Green	
V10.1	04/05/2018	Tony Coates	Chris Green	Minor textual amend – DPO contact details amended.

## REFERENCES

Number	Title	Reference
1	Information Commissioners Office Web-site - GDPR	<a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/</a>
2	Guide to the General Data Protection Regulation (GDPR)	Information Commissioners Office Guide dated 21 November 2017 v.1.0.30
3	Preparing for the General Data Protection Regulation (GDPR) – 12 steps to take now	Information Commissioners Office Guide dated 25 May 2017 v.2.0
4	EU General Data Protection Regulation – A Compliance Guide	IT Governance Ltd dated December 2016
5	Information Security Policy	Terrafix Ltd - – ISO27001-Policy-43 dated 31 August 2017 V1.4

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## 1 Introduction

Terrafix is committed to conducting its business in accordance with all applicable laws and regulations, and in line with the highest standards of ethical conduct.

This Policy and associated Operational Procedures have been written for compliance with the UK Data Protection Act (2018) which embodies the principles laid out in the European General Data Protection Regulation (GDPR).

Personal Data is any information which relates to an identified or Identifiable Person. It is subject to certain legal safeguards and regulations, which impose restrictions on how organisations may process Personal Data. An organisation that handles Personal Data and makes decisions about its use is known as a Data Controller. Terrafix is a Data Controller and as such is responsible for ensuring compliance with the legal Data Protection requirements.

The Policy identifies the expected behaviour of Terrafix Employees and Third Parties working with Terrafix in relation to the collection, use, retention, transfer, disclosure and destruction of any Personal Data that is processed or under the control of Terrafix. Non-compliance may expose Terrafix to complaints, regulatory action, fines and/or reputational damage. The Policy is supplemented by a number of Operational Procedures which provide details of how the Policy should be implemented.

The Terrafix management is fully committed to ensuring continued and effective implementation of this Policy and expects all Terrafix Employees and Third Parties working under contract with Terrafix to share in this commitment. Any breach of this Policy will be taken seriously and may result in disciplinary action or business sanction.

This Policy has been approved by the Terrafix Board of Directors who are responsible for its compliance.

## 2 Scope

This Policy applies to all Terrafix business activity where Personal Data is processed and covers by all Terrafix employees and any Third-Party contractor working for and on behalf of Terrafix.

The Policy applies to all processing of Personal Data in electronic form (including electronic mail and documents created with word processing software), or where it is held in manual files that are structured in a way that allows ready access to information about individuals.

Where UK law imposes a requirement that is not addressed in this Policy, the relevant UK law mandates and guidelines must be adhered to.

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## 3 Governance

### 3.1 Data Protection Officer (DPO)

To demonstrate our commitment to Data Protection and to enhance the effectiveness of our compliance efforts, Terrafix has an appointed Data Protection Officer.

The Data Protection Officer operates in an independent role, suitably qualified, skilled and granted all necessary authority.

The Data Protection Officer reports directly to Terrafix Managing Director, who has direct access to the Terrafix Board of Directors.

### 3.2 Policy Dissemination & Enforcement

The Terrafix Managers will ensure that all Terrafix Employees and Third-Parties working on behalf of Terrafix are aware of and comply with the contents of this Policy prior to exposure to Personal Data or undertaking any processing involving Personal Data.

Appropriate training will be provided.

### 3.3 Data Protection by Design

To ensure that all Data Protection requirements are identified and addressed when designing new systems or processes, and/or when reviewing or expanding existing systems or processes; each will go through a review/approval process before continuing.

This process is defined within the Design Management Procedures in the Terrafix ISO/IEC 9001 Quality System.

If necessary, a Privacy Impact Assessment (PIA) will be conducted by the Project Leader for review by the Data Protection Officer. The subsequent findings will then be submitted to the Terrafix Managing Director for review and formal approval.

### 3.4 Compliance Monitoring

To confirm that an adequate level of compliance is being achieved in relation to this Policy, the Data Protection Officer will carry out an annual Data Protection compliance audit. Each audit will, as a minimum, assess

- compliance with the Policy in relation to the protection of Personal Data and
- the effectiveness of Data Protection-related Operational Practices and Procedures.

A report from the Data Protection Officer will be submitted for consideration by the Terrafix Management Review process, chaired by the Managing Director. A plan for correcting any identified deficiencies within a defined and reasonable time frame will be actioned.

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## 4 Data Protection Principles

Terrafix has adopted the following principles to govern its collection, use, retention, transfer, disclosure and destruction of Personal Data:

### **Principle 1** Lawfulness, Fairness and Transparency

Personal Data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject. This means, Terrafix will tell the Data Subject what processing will occur (transparency), the processing must match the description given to the Data Subject (fairness), and it must be for one of the purposes specified in the Data Protection regulation (lawfulness).

### **Principle 2** Purpose Limitation

Personal Data shall be collected for specified, explicit and legitimate purposes, and not further processed in a manner that is incompatible with those purposes. This means, Terrafix will specify exactly what the Personal Data collected will be used for and limit the processing of that Personal Data to only what is necessary to meet the specified purpose.

### **Principle 3** Data Minimisation

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are Processed. This means Terrafix will not store any Personal Data beyond what is strictly required.

### **Principle 4** Accuracy

Personal Data shall be accurate and kept up to date. This means Terrafix will have in place processes for identifying and addressing out-of-date, incorrect and redundant Personal Data.

### **Principle 5:** Storage Limitation

Personal Data shall be 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. This means Terrafix will, wherever possible, store Personal Data in a way that limits or prevents identification of the Data Subject.

### **Principle 6** Rights of Data Subjects

Personal Data shall be processed in accordance with the rights of the Data Subjects. It should allow you to respond to Subject Access requests. For Personal Data held for marketing, the Data Subject should be able to opt out.

### **Principle 7** Integrity & Confidentiality

Personal Data shall be 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. Terrafix will use appropriate technical and organisational measures to ensure the integrity and confidentiality of Personal Data is maintained at all times.

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**Principle 8**      Transfer of Data

If data can be transferred outside the country, are there adequate levels of protection for the rights and freedoms of the Data Subjects.

**Principle 9**      Accountability

The Data Protection Officer and any nominated Data Controller will be responsible for and be able to demonstrate compliance. This means Terrafix will demonstrate that the eight Data Protection Principles (outlined above) are met for all Personal Data for which Terrafix is responsible.

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## 5 Data Collection

### 5.1 Data Sources

Personal Data will be collected only from the Data Subject, unless:

- The nature of the business necessitates collection of the Personal Data from other persons or bodies, or
- The collection is carried out under emergency circumstances to protect the vital interests of the Data Subject or to prevent serious loss or injury to another person.

If Personal Data is collected from someone other than the Data Subject, the Data Subject will be informed of the collection, unless:

- The Data Subject has received the required information by other means,
- The information must remain confidential due to a professional secrecy/privacy obligation, or
- UK or national law expressly provides for the collection, processing or transfer of the Personal Data.

Where it has been determined that notification to a Data Subject is required, notification will occur promptly, but in no case later than:

- One calendar month from the first collection or recording of the Personal Data
- At the time of first communication if used for communication with the Data Subject
- At the time of disclosure if disclosed to another recipient.

### 5.2 Lawful Bases

The Lawful purpose for collecting and processing Personal Data will be identified and recorded before any processing of the data will take place.

A Standard Terrafix Operating Procedure exists for identifying the different categories of Personal Data and detailing how Consent is managed.

### 5.3 Data Subject Consent

Terrafix will obtain Personal Data only by lawful and fair means and, where appropriate, with the knowledge and consent of the individual concerned. Where a need exists to request and receive the consent of an individual prior to the collection, use or disclosure of their Personal Data, Terrafix will seek such consent.

### 5.4 Data Subject Notification

Terrafix will provide Data Subjects with information as to the purpose of the processing of their Personal Data.

When the Data Subject is asked to give consent to the processing of Personal Data, and when any Personal Data is collected from the Data Subject, all appropriate disclosures will be made in a manner that draws attention to them.

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## 5.5 External Privacy Notices

The Terrafix corporate website will include an online “Privacy Notice” and “Cookie Notice” fulfilling the requirements of Data Protection Act.

## 6 Data Use

### 6.1 Data Processing

Terrafix uses the Personal Data of its contacts for the following broad purposes:

- The general running and business administration.
- To provide services to Terrafix customers.
- The ongoing administration and management of customer services.

The use of a contact’s information should always be considered from their perspective, and whether the use will be within their expectations, or if they are likely to object.

In any circumstance where consent has not been gained for the specific processing in question, Terrafix will determine the fairness and transparency of any processing beyond the original purpose for which the Personal Data was collected and seek additional consent if necessary.

### 6.2 Special Categories of Data

Terrafix will only process Special Categories of Data (also known as sensitive data) where the Data Subject expressly consents to such processing or where one of the following conditions apply:

- The Processing relates to Personal Data which has already been made public by the Data Subject.
- The Processing is necessary for the establishment, exercise or defence of legal claims.
- The Processing is specifically authorised or required by law.
- The Processing is necessary to protect the vital interests of the Data Subject, or of another natural person where the Data Subject is physically or legally incapable of giving consent.
- Further conditions, including limitations, based upon national law related to the Processing of genetic data, biometric data or data concerning health.

Where Special Categories of Data are being Processed, Terrafix will adopt additional protection measures.

### 6.3 Children’s Data

Terrafix do, from time to time employ young people between the ages of 16-18 on work experience or casual holiday work engagements, therefore safeguarding of the individual and information of a personal nature is of paramount importance.

Children are unable to consent to the processing of Personal Data for information society services so consent will be sought from the person who holds parental responsibility over the child.

Should Terrafix foresee a business need for obtaining parental consent for information society services offered directly to a child, guidance and approval will be obtained from the Data Protection Officer before any processing of a child’s Personal Data may commence.

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## 6.4 Data Quality

Terrafix will adopt all necessary measures to ensure that the Personal Data it collects and Processes is complete and accurate in the first instance, and is updated to reflect the current situation of the Data Subject.

## 6.5 Profiling & Automated Decision-Making

Terrafix do not currently have a business requirement for profiling or automated decision making.

Terrafix will only engage in profiling and automated decision-making where it is necessary to perform a contract with the Data Subject, or where it is authorised by law.

## 6.6 Digital Marketing

As a general rule, Terrafix will not send promotional or direct marketing material to a Terrafix contact through digital channels such as mobile phones, email and the Internet, without first obtaining their consent. Digital marketing campaigns will not be conducted without prior consent from the Data Subject and approval will be gained from the Data Protection Officer prior to the campaign.

Where Personal Data processing is approved for digital marketing purposes, the Data Subject will be informed at the point of first contact that they have the right to object, at any stage, to having their data processed for such purposes. If the Data Subject puts forward an objection, digital marketing related processing of their Personal Data will cease immediately, and their details will be kept on a suppression list, with a record of their opt-out decision, rather than being completely deleted.

Where digital marketing is carried out in a 'business to business' context, there is no legal requirement to obtain an indication of consent to carry out digital marketing to individuals, provided that they are given the opportunity to opt-out.

## 7 Data Retention

To ensure fair processing, Personal Data will not be retained by Terrafix for longer than necessary in relation to the purposes for which it was originally collected or for which it was further processed.

The length of time for which Terrafix needs to retain Personal Data is set out in the Terrafix "Personal Data Retention Schedule". This takes into account the legal and contractual requirements, both minimum and maximum, that influence the retention periods set forth in the schedule.

All Personal Data will be deleted or destroyed as soon as possible where it has been confirmed that there is no longer a need to retain it.

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## 8 Protection of Data

Terrafix will adopt physical, technical, and organisational measures to ensure the security of Personal Data. This includes the prevention of loss or damage, unauthorised alteration, access or processing, and other risks to which it may be exposed by virtue of human action, or the physical or natural environment.

The minimum set of security measures to be adopted is provided in the Terrafix “Security Policy Document”.

## 9 Data Subject Requests

The Data Protection Officer will establish a system to enable and facilitate the exercise of Data Subject rights related to:

- Information access.
- Objection to processing.
- Objection to automated decision-making and profiling.
- Restriction of processing.
- Data portability.
- Data rectification.
- Data erasure.

If an individual makes a request relating to any of the rights listed above, Terrafix will consider each such request in accordance with all applicable Data Protection laws and regulations. No administration fee will be charged for considering and/or complying with such a request, unless the request is deemed to be unnecessary or excessive in nature.

All requests received for access to, or rectification of Personal Data must be directed to the Data Protection Officer, who will log each request as it is received.

A response to each request will be provided within 30 days of the receipt of the written request from the Data Subject.

Appropriate verification will confirm that the requestor is the Data Subject or their authorised legal representative. Data Subjects will have the right to require Terrafix to correct or supplement erroneous, misleading, outdated, or incomplete Personal Data.

If Terrafix cannot respond fully to the request within 30 days, the Data Protection Officer, shall nevertheless provide the following information to the Data Subject, or their authorised legal representative within the specified time:

- An acknowledgement of receipt of the request.
- Any information located to date.
- Details of any requested information or modifications which will not be provided to the Data Subject, the reasons for the refusal and any procedures available for appealing the decision.
- An estimated date by which any remaining responses will be provided.

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- An estimate of any costs to be paid by the Data Subject (e.g. where the request is excessive in nature).
- The name and contact information of the Terrafix individual who the Data Subject should contact for follow up.

It should be noted that situations may arise where providing the information requested by a Data Subject would disclose Personal Data about another individual. In such cases, information will be redacted or withheld, as may be necessary or appropriate to protect that person's rights.

Detailed guidance for dealing with requests from Data Subjects can be found in the "Terrafix Standard Operating procedure for the Request for Personal Information, Amendment or Deletion".

## 10 Police or Other Government Law Enforcement Agency Requests & Disclosures

In certain circumstances, it is permitted for Personal Data to be shared without the knowledge or consent of a Data Subject. This is the case where the disclosure of the Personal Data is necessary for any of the following purposes:

- The prevention or detection of crime.
- The apprehension or prosecution of offenders.
- The assessment or collection of a tax or duty.
- By the order of a court, or by any rule of law.

Any request from a court, or any regulatory, Police or law enforcement authority for information relating to a Terrafix contact will be forwarded to the Data Protection Officer, who will provide guidance and assistance in what information may be disclosed.

## 11 Training

All Terrafix employees that have access to Personal Data will have their responsibilities under this Policy outlined to them, as part of their staff induction training. In addition, Terrafix will provide regular Data Protection training and procedural guidance for their staff.

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## 12 Data Transfers

Terrafix is a UK based business and under normal circumstances would not have a requirement to transfer Personal Data to any recipient located in another country. Should this situation change, Terrafix will ensure that there is an adequate level of legal protection for the rights and freedoms of the relevant Data Subjects.

### 12.1 Transfers between Terrafix Sites (Dalgety Bay, Terrafix Scotland)

In order for Terrafix to carry out its operations effectively across its sites, there may be occasions when it is necessary to transfer Personal Data between Terrafix HQ (Stoke-on-Trent) and Terrafix Scotland (Dalgety Bay). Should this occur, the originating Terrafix site sending the Personal Data remains responsible for ensuring protection for that Personal Data.

All data transfers will be in accordance with the procedures defined in the Terrafix Security Policy.

### 12.2 Transfers to Third Parties

Terrafix will only transfer Personal Data or allow access by Third Parties when it is assured that the information will be processed legitimately and protected appropriately by the recipient.

This will be managed under the auspices of a formal Data Processing Agreement and will be subject to regular audits, especially with respect to the technical and organisational measures the Third-Party has in place.

Any major deficiencies identified will be reported to and monitored by the Terrafix Board of Directors.

## 13 Complaints Handling

Data Subjects with a complaint about the processing of their Personal Data, should put forward the matter in writing to the Data Protection Officer.

An investigation of the complaint will be carried out to the extent that is appropriate, based on the merits of the specific case. The Data Protection Officer will inform the Data Subject of the progress and the outcome of the complaint within a reasonable period.

If the issue cannot be resolved through consultation between the Data Subject and the Data Protection Officer, then the Data Subject may, at their option, seek redress through mediation, binding arbitration, litigation, or via complaint to the Information Commissioners Office (ICO).

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## 14 Breach Reporting

Any individual who suspects that a Personal Data Breach has occurred due to the theft or exposure of Personal Data, must immediately notify the Data Protection Officer, providing a description of what occurred.

Notification of the incident can be made via e-mail to <dpo@terrafix.co.uk>, or by calling <01782 577015 extn 242>.

The Data Protection Officer will investigate all reported incidents to confirm whether or not a Personal Data Breach has occurred. If a Personal Data Breach is confirmed, the Data Protection Officer will follow the relevant Operating Procedure and inform the Managing Director accordingly.

For severe Personal Data Breaches, The Managing Director will initiate and chair an emergency response meeting to coordinate and manage the Personal Data Breach response.

## 15 Policy Maintenance

All inquiries about this Policy, including requests for exceptions or changes should be directed to the Data Protection Officer via e-mail <dpo@terrafix.co.uk>.

If any member of staff believes there are conflicting requirements in this Policy, the Terrafix Data Protection Officer shall be informed for clarification.

The Data Protection Officer can also seek clarification from the Information Commissioner's Office (ICO) Office if necessary.

### 15.1 Publication

This Policy will be available to all Terrafix Employees through the Company Policy Portal.

### 15.2 Effective Date

This Policy is effective as of [DATE].

### 15.3 Revisions

The Data Protection Officer is responsible for the maintenance and accuracy of this Policy, which is formally approved by the Terrafix Board of Directors.

Notice of significant revisions will be provided to Terrafix Employees when the Policy is published on Terrafix Policy Portal.

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## 16 Related Documents

Listed below are documents that relate to and are referenced by this Policy.

### 16.1 Related Policies

Terrafix Information Security Policy

### 16.2 Operational Procedures

TSOP 401 Terrafix Standard Operating Procedure for Privacy Impact Assessment.

TSOP 402 Terrafix Standard Operating Procedure for Collection of Personal Data.

TSOP 403 Terrafix Standard Operating Procedure for Use of Personal Data.

TSOP 404 Terrafix Standard Operating Procedure for Request for Personal Information, Amendment or Deletion.

TSOP 406 Terrafix Standard Operating Procedure for the Data Protection Officer.

#### Miscellaneous Documentation

- Data Protection Policy for Employee Data
- Personal Data Retention Schedule
- Standard Data Processing Agreement
- Standard Provisions for Outsourcing Agreement
- Binding Corporate Rules Agreement

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## 17 Definitions

- Anonymisation:** Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) by any means or by any person.
- Binding Corporate Rules:** The Personal Data protection policies used for the transfer of Personal Data to one or more Third Countries within a group of undertakings, or group of enterprises engaged in a joint economic activity.
- Contact:** Any past, current or prospective Terrafix customer.
- Consent:** Any freely given, specific, informed and unambiguous indication of the Data Subject's wishes, by which he or she, by a statement, or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her, including special categories of Data Personal Data pertaining to or revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; data concerning health or sex life and sexual orientation; genetic data or biometric data.
- Data Controller:** A natural or legal person, Public Authority, Agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.
- Data Processors:** A natural or legal person, Public Authority, Agency or other body which Processes Personal Data on behalf of a Data Controller.
- Data Protection:** The process of safeguarding Personal Data from unauthorised or unlawful disclosure, access, alteration, Processing, transfer or destruction.
- Data Protection Authority:** An independent Public Authority responsible for monitoring the application of the relevant Data Protection regulation set forth in UK/national law.
- Data Subject:** The identified or Identifiable Natural Person to which the data refers.
- Employee:** An individual who works part-time or full-time for Terrafix under a contract of employment, whether oral or written, express or implied, and has recognised rights and duties. This includes temporary employees and independent contractors.
- Encryption:** The process of converting information or data into code, to prevent unauthorised access.
- Identifiable Natural Person:** Anyone 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 one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

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- Personal Data:** Any information (including opinions and intentions) which relates to an identified or Identifiable Natural Person.
- Personal Data Breach:** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed.
- Process, Processed, Processing:** Any operation or set of operations performed on Personal Data, or on sets of Personal Data, whether or not by automated means. Operations performed, may include collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- Profiling:** Any form of automated processing of Personal Data where, Personal Data is used to evaluate specific or general characteristics relating to an Identifiable Natural Person. In particular, to analyse or predict certain aspects concerning that natural person's performance at work, economic situations, health, personal preferences, interests, reliability, behaviour, location or movement.
- Pseudonymisation:** Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) without a "key" that allows the data to be re-identified.
- Terrafix Entity:** A Terrafix establishment, including subsidiaries and joint ventures, over which Terrafix exercise management control.
- Third Country:** Any country not recognised as having an adequate level of legal protection for the rights and freedoms of Data Subjects, in relation to the Processing of Personal Data.
- Third Party:** An external organisation with which Terrafix conducts business and is also authorised to, under the direct authority of Terrafix, Process the Personal Data of Terrafix Contacts.

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