# **Security Policy Document**

**PAES UK Limited** 



# **Objectives**

The objective of this Privacy & Cookie Policy is to outline our commitment to protecting the personal information of all individuals who interact with our website and services. We aim to clearly explain what data we collect, why we collect it, how it is processed, and the measures we take to keep it secure. Our policy is designed to ensure full compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations (PECR). We believe in maintaining transparency at every stage of data handling, giving you clear choices regarding the use of your information, and ensuring that your privacy rights are respected and upheld. By setting out these principles, we aim to build and maintain trust while delivering a secure and reliable online experience..

# **Policy Statements**

# **General Security**

### Confidentiality Agreement

Purpose and Scope: The Confidentiality Agreement is a binding legal document that every employee, contractor, and third-party service provider must sign prior to initiating their engagement with PAESUK. This agreement is comprehensive and explicitly delineates the sensitive nature of the data handled by PAESUK's software solutions and the expectation of strict confidentiality that accompanies the handling of such information.

#### Key Clauses

#### 1. Data Protection and Privacy:

The agreement outlines the responsibility of all signatories to adhere to the principles of data protection and privacy, in alignment with the Data Protection Act, GDPR, and any other applicable laws. It stipulates the requirement to process personal data lawfully, fairly, and in a transparent manner, ensuring the rights of data subjects are upheld.

#### 2. Information Security:

Signatories are required to commit to protecting the integrity, availability, and confidentiality of all information assets they encounter. This includes company proprietary information, client data, operational details of the company products, as well as any non-public information they may access during their tenure at PAESUK.

#### 3. Unauthorised Disclosure:

The agreement contains clauses that define unauthorised disclosure and the consequences of such actions. It outlines preventative measures such as secure handling of information, proper disposal of sensitive documents, and the avoidance of discussions regarding confidential matters in unsecured environments.

#### 4. Ongoing Obligations:

It is emphasised that the obligations related to confidentiality continue beyond the termination of the contract or employment. The signatories are reminded that the obligation to protect sensitive information is enduring and does not cease upon the conclusion of their work with PAESUK.

#### 5. Reporting Obligations:

An obligation to report any actual or suspected breaches of confidentiality or security incidents promptly to the designated PAESUK authority is included. This ensures that any potential breaches can be managed and remediated swiftly to minimise impact.

### 6. Training and Acknowledgment:

The agreement mandates that all signatories undergo regular training on data protection and information security. This is to ensure that they are aware of the evolving landscape of data security and their roles within it. Signatories are also required to acknowledge that they have read, understood, and agree to comply with all relevant policies and procedures related to information security at PAESUK.

#### 7. Legal Recourse:

The agreement clearly outlines the legal ramifications of breaching the confidentiality terms, including potential civil and criminal penalties. This serves as a deterrent against unauthorised disclosure and underscores the seriousness with which PAESUK regards information security.

#### Execution and Review

The Confidentiality Agreement is to be signed before an individual is granted access to any of PAESUK's systems or information. It is reviewed annually to ensure that it remains up to date with current laws, regulations, and company policies, and signatories may be required to re-affirm their commitment by signing updated versions as necessary.

# **Data Protection**

# Compliance with Data Protection Legislation

UK Data Protection Act and GDPR: PAESUK Limited reaffirms its unwavering commitment to the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) as it applies to UK residents. Compliance with these regulations is not merely a legal obligation but a core aspect of our ethical responsibility to our clients and stakeholders. These regulations set the foundation for how personal data must be handled, ensuring that the privacy rights of individuals are respected and protected.

# **Principles of Data Processing**

#### 1. Lawfulness, Fairness, and Transparency:

a. PAESUK processes all personal data lawfully, fairly, and transparently, providing clear information to data subjects about how their data is used. All processing activities have a legitimate basis, and we ensure that individuals are informed of this through appropriate privacy notices.

#### 2. Purpose Limitation:

a. Data collected by PAESUK is gathered for specified, explicit, and legitimate purposes. It is not further processed in any manner incompatible with those purposes, except as required or permitted by law.

#### 3. Data Minimisation:

a. PAESUK adheres to the principle of data minimisation, ensuring that personal data collected and processed is adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

#### 4. Accuracy:

a. Every effort is made to ensure that personal data is accurate and, where necessary, kept up to date. Inaccurate data is either corrected or deleted without delay.

#### 5. Storage Limitation:

a. Personal data is kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. PAESUK maintains data retention policies and procedures to ensure compliance with this principle.

#### 6. Integrity and Confidentiality:

a. Personal data is processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage. PAESUK employs suitable technical or organisational measures to uphold the integrity and confidentiality of personal data.

## **Cookie Policy**

Cookies are small text files that are placed on your device when you visit our website. They help us provide you with a better browsing experience, remember your preferences, and understand how visitors interact with our site. Some cookies are essential for the site to function properly, while others allow us to improve performance, enhance functionality, or deliver relevant content and advertising.

We use different types of cookies on our website. **Strictly necessary cookies** are required for the basic operation of the site and enable you to navigate pages, use secure areas, and complete transactions. These cookies do not require your consent. **Performance cookies** help us understand how visitors use our site by collecting anonymous statistical data, enabling us to improve the design and functionality. **Functionality cookies** allow the website to remember your choices, such as language preferences or login details, to provide a more personalised experience. **Targeting or advertising cookies** are used to deliver content and advertisements that are more relevant to you and your interests.

In compliance with the Privacy and Electronic Communications Regulations (PECR), we only place non-essential cookies on your device after obtaining your explicit consent. When you first visit our website, you will see a cookie banner giving you the option to accept or reject non-essential cookies. You can also change your cookie preferences at any time using our Cookie Settings tool or through your browser settings. Please note that disabling certain cookies may affect the functionality and user experience of our website.

For more information on the specific cookies we use, their purposes, and their retention periods, please refer to our detailed Cookie Settings page or contact us at <a href="mailto:info@paesuk.com">info@paesuk.com</a>