



greenwillows associates ltd

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Ecological Surveys • Habitat Management • Arboricultural Surveys • Vegetation Clearance

Data Protection Policy

1. Data Protection Policy

1.1. Introduction

At Greenwillows Associates, we are committed to being open about how we collect, use, and protect your personal data. This policy outlines our commitment to data protection, as well as your rights and responsibilities when it comes to handling personal information.

This policy covers the personal data of job applicants, employees, contractors, volunteers, interns, apprentices, and former employees.

You will be notified of the person responsible for data protection.

1.2. Definitions

1.2.1. Personal data

Any information that can identify an individual.

1.2.2. Special categories of personal data

This includes sensitive information like racial or ethnic origin, political opinions, religious beliefs, health data, and biometric data.

1.2.3. Criminal records data

Information about an individual's criminal convictions and related legal proceedings.

1.2.4. Data protection principles

We process personal data according to the following principles:

- We process data legally and transparently.
- We only collect data for specific, legitimate purposes.
- We process only the data necessary for those purposes.
- We keep data accurate and up-to-date, and correct any inaccuracies promptly.
- We retain data only as long as necessary.
- We protect personal data with appropriate security measures to prevent unauthorised access, loss, or damage.
- We inform individuals about why we process their data, how it's used, and the legal basis for doing so in our privacy notices.

1.2.5. Individual rights

You have several rights regarding your personal data, including:

1.2.6. Subject access requests

You can ask us whether we're processing your data, why we're doing so, to whom it's disclosed, how long it's stored, and more. We'll provide a copy of your data if requested. Please direct these requests to claire@greenwillowsassociates.co.uk. We may need to verify your identity before processing the request, and we'll typically respond within one month.

1.2.7. Other rights

You can request that we:

- Correct inaccurate data.
- Stop processing or delete data that's no longer necessary.

- Stop processing data if your interests outweigh our legitimate grounds.
- Halt processing data if it's inaccurate or if there's a dispute over its use.

If you'd like to exercise any of these rights, please contact the HR Manager.

1.2.8. Data security

We take data security seriously and have policies in place to protect personal data from loss, misuse, or unauthorised access. Access to personal data is restricted to employees who need it to perform their job duties.

When we work with third parties to process data, they're bound by confidentiality and required to implement appropriate security measures.

1.2.9. Data breaches

The below sets out how Greenwillows handles personal data breaches under UK GDPR and applies to all staff, subcontractors, and partners handling personal data.

Definition of a Breach definition - Any incident leading to unauthorised access, loss, or alteration of personal data.

Roles & Responsibilities:

Role	Responsibility
Data Protection Lead	Coordinates breach response, assesses risks, reports to ICO if needed (ICO stands for Information Commissioner's Office. It's the UK's independent authority set up to uphold information rights and enforce data protection laws, including the UK GDPR and Data Protection Act 2018).
All Staff	Report suspected breaches immediately
IT Support	Contain and remediate technical breaches

Breach Response Steps:

- Identify & Report: Log in Data Breach Log immediately
- Contain: Secure records, revoke access, remote wipe devices
- Assess Risk: Evaluate data type, volume, harm risk
- Notify ICO: Within 72 hrs if rights/freedoms at risk
- Notify Individuals: If high risk, explain incident and actions taken
- Review: Investigate root cause, update training/processes

Data Breach Log Template

Incident Ref.	
Date & Time Discovered	
Reported By	

Description of Breach	
Type of Data Involved	
Individuals Affected	
Containment Actions	
ICO Notified (Y/N)	
Date ICO Notified	
Individuals Notified (Y/N)	
Follow-up Actions	
Closed By / Date	

Training & Awareness

- Annual GDPR/Cyber Security/data handling training for all staff
- Induction includes breach reporting procedure

1.2.10. International data transfers

We will not transfer HR-related personal data outside the EEA unless specified and safeguarded appropriately.

1.2.11. Your responsibilities

You have the following responsibilities when it comes to data protection:

- To help us keep your data accurate, please notify us promptly of any changes. If you handle personal data as part of your role, you're expected to:
 - Access only data you're authorised to and for approved purposes.
 - Keep data secure by following our access rules, including password protection and secure file storage.
 - Avoid removing personal data from our premises unless it's properly secured.
 - Do not store personal data on local drives or personal devices.

Failing to follow these guidelines may result in disciplinary action.

1.2.12. Training

We provide training on data protection responsibilities during induction and at regular intervals. If your role involves regular access to personal data or managing this policy, you'll receive additional training to ensure compliance.

Reviews:

This policy will be reviewed annually and if there are major changes to the way GWA operates, to HSE or government guidelines or relevant new regulations.

Steve Parnwell

CEO, Director and Principal Ecologist

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