ADVANCED ENGINEERING GROUP

POWER · MOTION · CONTROL

GDPR & DATA PRIVACY POLICY

Introduction

ADVANCED ENGINEERING GROUP (the company) is committed to ensuring the privacy and protection of all personal data we process. This policy outlines our approach to GDPR compliance, applicable under UK law, and details how we handle data shared across our group of companies, including employees, suppliers, customers, and confidential information.

Scope

This policy applies to all companies within the ADVANCED ENGINEERING GROUP operating in the UK, covering all personal data processing activities related to employees, suppliers, customers, and confidential information.

Company Structure

Headquartered in SILSDEN, UK, ADVANCED ENGINEERING GROUP operates internationally through various legal entities, including:

- **ADVANCED ACTUATORS LIMITED**
- **ADVANCED COMPONENTS LIMITED**
- **ADVANCED DRIVES**

Definitions

- **Personal Data**: Any information relating to an identified or identifiable natural person.
- **Processing**: Any operation performed on personal data, whether automated or manual.
- **Data Subject**: An individual whose personal data is processed by the company.
- **Controller**: The company, which determines the purposes and means of processing data.
- **Processor**: Any entity that processes personal data on behalf of the company.

Principles of Data Protection

The company adheres to the principles of the GDPR:

- **Lawfulness, Fairness, and Transparency**: Personal data shall be processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation**: Data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimization**: Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy**: Data shall be accurate and, where necessary, kept up to date.
- **Storage Limitation**: Data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data are processed.
- **Integrity and Confidentiality**: Data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.
- **Accountability**: the company shall be responsible for, and be able to demonstrate compliance with, the GDPR.

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Data Subject Rights

Data subjects have the following rights regarding their personal data:

- **Right to be Informed**: Individuals have the right to be informed about the collection and use of their personal data.
- **Right of Access**: Individuals have the right to access their personal data and supplementary information.
- **Right to Rectification**: Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete.
- **Right to Erasure**: Individuals have the right to have personal data erased under certain conditions.
- **Right to Restrict Processing**: Individuals have the right to request the restriction or suppression of their personal data.
- **Right to Data Portability**: Individuals have the right to obtain and reuse their personal data for their own purposes across different services.
- **Right to Object**: Individuals have the right to object to the processing of their personal data in certain circumstances.
- **Rights related to Automated Decision Making and Profiling**: Individuals have rights related to automated decision-making and profiling.

Data Collection and Use

Employees

- **Data Collected**: Name, contact details, identification numbers, financial information, performance data, and other employment-related information.
- **Purpose**: Recruitment, HR management, payroll processing, compliance with legal obligations.
- **Legal Basis**: Performance of a contract, legal obligation, legitimate interests, consent (where applicable).

Suppliers

- **Data Collected**: Contact details, financial information, business-related communications.
- **Purpose**: Supplier management, contract execution, payment processing.
- **Legal Basis**: Performance of a contract, legitimate interests.

Customers

- **Data Collected**: Contact details, purchase history, payment information, customer support interactions.
- **Purpose**: Order fulfilment, customer service, marketing (with consent), compliance with legal obligations.
- **Legal Basis**: Performance of a contract, legitimate interests, consent (where applicable).

Confidential Information

- **Data Collected**: Business strategies, intellectual property, proprietary information.
- **Purpose**: Business operations, strategic planning, maintaining competitive advantage.
- **Legal Basis**: Legitimate interests, contractual necessity, consent (where applicable).

Data Sharing and Transfers

Personal data may be shared with third parties, including:

- **Service Providers**: For IT services, payroll, marketing, and other business operations.
- **Legal and Regulatory Authorities**: As required by law.
- **Group Companies**: Within the Advanced Engineering Group for administrative and business purposes.

International data transfers are conducted in accordance with GDPR requirements, ensuring adequate protection measures are in place.

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Data Security

the company implements appropriate technical and organizational measures to safeguard personal data against unauthorized access, alteration, disclosure, or destruction. This includes encryption, access controls, and regular security assessments.

Data Retention

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal, regulatory, and internal policy requirements.

Data Breach Response

In the event of a data breach, the company will promptly assess the risk to individuals' rights and freedoms and, where necessary, report the breach to the Information Commissioner's Office (ICO) and affected individuals in accordance with GDPR requirements.

Training and Awareness

Training Notes are attached to this Policy and should be read by all employees; anyone requiring any further guidance or external training should notify your line manager or a Director of the company

Policy Review

This policy is reviewed annually or as required to ensure compliance with relevant laws and regulations.

This policy has been endorsed and approved by:



Andrew Peace
Managing Director

Date: 1st June 2026

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TRAINING NOTES

Introduction

The General Data Protection Regulation (GDPR) and data privacy policies are essential components of our operations at Advanced Engineering Group. As employees, your understanding and adherence to these policies are crucial for protecting personal data and ensuring compliance with legal requirements. This section provides detailed guidance to help you understand the importance of data privacy and your role in maintaining it.

Why GDPR and Data Privacy Matter

Legal Compliance

GDPR is a legal requirement that applies to all businesses operating within the European Union (EU) and European Economic Area (EEA), including those that export goods and services. Non-compliance can result in severe penalties, including substantial fines and legal actions, which can damage our company's reputation and financial standing.

Trust and Reputation

Maintaining the trust of our customers, employees, suppliers, and other stakeholders is vital for our business success. By protecting personal data and ensuring privacy, we demonstrate our commitment to ethical practices and build confidence in our operations.

Risk Management

Proper data protection minimizes the risk of data breaches, which can lead to financial loss, legal liability, and damage to our reputation. By adhering to GDPR principles, we mitigate these risks and safeguard our business.

Personal Responsibility

As employees, you handle personal data regularly. Understanding and following data privacy policies protect not only the company but also your professional integrity and the privacy of your colleagues, customers, and partners.

Key Principles of Data Protection

Lawfulness, Fairness, and Transparency

Always ensure that personal data is processed lawfully, fairly, and transparently. This means being clear about why data is collected, how it will be used, and ensuring individuals are aware of their rights.

Purpose Limitation

Collect personal data only for specific, explicit, and legitimate purposes. Do not use data for purposes other than those stated without obtaining further consent.

Data Minimization

Collect only the data that is necessary for the intended purpose. Avoid excessive or irrelevant data collection.

Accuracy

Ensure that personal data is accurate and kept up to date. Correct or delete any inaccurate data promptly.

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Storage Limitation

Do not retain personal data longer than necessary. Follow our data retention policies and securely dispose of data that is no longer needed.

Integrity and Confidentiality

Protect personal data against unauthorized access, loss, or damage. Use appropriate security measures, such as encryption and access controls, to safeguard data.

Employee Responsibilities

Handling Data

- Always verify the purpose and legality of data collection.
- Obtain consent where required.
- Limit access to personal data to authorized personnel only.
- Ensure data is accurate and up to date.

Data Security

- Use strong passwords and change them regularly.
- Do not share passwords or allow others to use your access credentials.
- Report any suspicious activity or potential data breaches immediately.
- Use encryption for sensitive data when transferring or storing it.

Communication

- Be transparent with data subjects about how their data will be used.
- Provide clear information on data protection rights and how individuals can exercise them.
- Use secure communication channels when sharing personal data.

Data Breach Procedures

In the event of a data breach:

- Immediately report the breach to your supervisor or the Data Protection Officer (DPO).
- Follow the incident response procedures to contain and mitigate the breach.
- Cooperate with the investigation and documentation process to understand the breach's impact and prevent future occurrences.

Conclusion

Data privacy and GDPR compliance are integral to our business operations. By understanding and adhering to these principles, you help protect our company's reputation, build trust with our stakeholders, and ensure a secure working environment. Your diligence and commitment to data protection are vital for our continued success and legal compliance.

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