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# Data Protection Policy Statement

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POL-018

John Graham Holdings Ltd. ("GRAHAM") is fully committed to ensuring compliance with the requirements of the EU General Data Protection Regulation (the "GDPR"), the Privacy & Electronic Communication Regulation 2003, and any other relevant legislation, which addresses the preservation and protection of personal data. We regard the lawful and proportionate treatment of personal data as vital to our continued successful operations, and in establishing and maintaining confidence between GRAHAM and those with whom we interact.

The GDPR exists to protect individuals' rights to privacy in respect of the processing of their personal data. The GDPR lays down principles governing the processing of personal data - that is data from which a living individual may be identified, directly or indirectly. The GDPR covers all personal data in whichever form it exists, either physical or digital.

The Privacy & Electronic Communications Regulations 2003 is supplementary to the GDPR and covers provisions concerning electronic communications and privacy. This includes the following:

- Provisions specific to electronic communications service providers: -
  - Use of traffic data Security
  - Provisions covering the use of cookies
- Provisions covering the use of facsimile machines, electronic mail and unsolicited calls for direct marketing purposes.

GRAHAM will ensure that all employees who have access to any personal data, held by or on behalf of GRAHAM or any of its subsidiaries, are fully aware of and abide by their duties under the GDPR.

Compliance with this Policy is mandatory, any breach will be taken seriously and may result in disciplinary action being taken in accordance with GRAHAM Disciplinary Policy & Procedure.

Any employee who considers that the Data Protection Policy Statement has not been followed, should raise the matter directly with the Data Protection Officer or via the Data Breach Management Guidelines or the Whistleblowing Procedure as applicable.

GRAHAM will ensure that appropriate security measures are implemented to prevent the unlawful or unauthorised processing, accidental loss, or damage to, personal data.

All employees are responsible for ensuring that:

- Any personal data they hold, whether in electronic or physical format, is kept securely;
- Personal data of any form is not disclosed deliberately or accidentally either orally or in writing to any unauthorised third party;
- Any personal data with which they are responsible for dealing is regularly reviewed to ensure it remains current and accurate; and
- The review and disposal of historic personal data is undertaken in accordance with the Data Retention and Disposal Guidelines.

GRAHAM has appointed a Data Protection Officer who is responsible for the monitoring and implementation of this policy, and who will act as the first point of contact for any data protection queries or matters. The GRAHAM Data Protection Officer is Ciarán Fegan, Head of Legal Services. Any queries in relation to this policy or data protection more generally within GRAHAM should be addressed to [dataprotection@graham.co.uk](mailto:dataprotection@graham.co.uk).

The Data Protection Policy has been approved by the Board of Directors of GRAHAM and will be brought to the attention of all employees. This Policy may be amended by GRAHAM from time to time. It will be reviewed at least annually, and more frequently as required.



**MICHAEL GRAHAM**  
Group Executive Chairman  
John Graham Holdings Ltd.