

Data Processing Policy



Gemini Print Solutions (“we”, “our”, “us”) may engage third-party service providers (“Data Processors”) to perform certain services that involve the processing of personal data on our behalf. Any such engagement will be governed by a **formal Data Processing Agreement (DPA)**, consistent with the requirements of the **UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018**.

These agreements ensure that:

1. **Scope of Processing:** The Data Processor may only process personal data strictly for the purposes explicitly authorised by Gemini Print Solutions and as necessary to perform the contracted services. Processing for any other purpose is prohibited.
2. **Compliance and Legal Obligations:** All Data Processors are required to comply with all applicable data protection legislation, including the UK GDPR. This includes implementing appropriate technical and organisational measures to ensure the security, confidentiality, and integrity of personal data.
3. **Sub-Processing:** Any engagement of sub-processors by the Data Processor will be subject to prior written consent from Gemini Print Solutions and governed by a written Sub-Processing Agreement imposing equivalent obligations to those in the primary DPA.
4. **Data Subject Rights:** Data Processors are contractually obliged to provide reasonable assistance to Gemini Print Solutions in responding to requests from data subjects, including access, correction, erasure, restriction, and objection requests, as well as requests relating to data portability.
5. **Transfers of Data:** Any transfer of personal data outside the United Kingdom or the European Economic Area (EEA) will only occur where appropriate safeguards are in place, in compliance with UK GDPR Chapter 5 requirements, and with our prior written authorisation.
6. **Data Security:** Data Processors must implement and maintain appropriate security measures, including access controls, encryption, pseudonymisation where practicable, secure storage, secure transmission, backup procedures, and secure disposal methods. All personnel with access to personal data are required to maintain confidentiality.
7. **Breach Notification:** Data Processors must notify us without undue delay of any personal data breach, unauthorised access, loss, or other incident affecting personal data. Prompt cooperation with Gemini Print Solutions will be provided to mitigate and remediate any breach.

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- 8. Duration and Termination:** Upon termination of the engagement or cessation of processing, all personal data must be returned to Gemini Print Solutions or securely deleted in accordance with our written instructions and legal obligations.

In summary, any agreement between Gemini Print Solutions and a Data Processor will strictly adhere to these terms, providing a legally binding framework to safeguard personal data, ensure accountability, and maintain compliance with the UK GDPR.

A handwritten signature in black ink, appearing to read "Steve Cropper".

Steve Cropper

Director

Updated: 12th January 2026

Next Review Date: 12th January 2027