

1. Introduction

This Policy sets out the obligations of **Gemini Print Solutions** regarding data protection and the rights of customers, suppliers, business contacts, and employees (“data subjects”) in respect of their personal data under UK and EU data protection law, including the UK GDPR and the EU General Data Protection Regulation (EU 2016/679) (“GDPR”).

“Personal data” means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified directly or indirectly, for example, by name, identification number, location data, online identifiers, or one or more factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity.

This Policy outlines Gemini Print Solutions’ obligations regarding the collection, processing, transfer, storage, and disposal of personal data. All employees, agents, contractors, or other parties acting on behalf of the Company must follow these procedures and principles at all times.

The Company is committed to not only complying with the law but also upholding the spirit of the law, ensuring the lawful, fair, and responsible handling of all personal data and maintaining the trust of all individuals with whom it interacts.

2. Data Protection Principles

Gemini Print Solutions ensures that all personal data is:

1. **Processed lawfully, fairly, and transparently;**
2. **Collected for specific, explicit, and legitimate purposes**, and not processed in ways incompatible with those purposes;
3. **Adequate, relevant, and limited** to what is necessary for the stated purposes;
4. **Accurate and up-to-date**, with prompt correction or deletion of inaccurate data;
5. **Kept only as long as necessary**, with appropriate measures for longer storage for archiving, research, or statistical purposes;
6. **Processed securely**, protecting against unauthorised processing, loss, damage, or destruction.

3. Rights of Data Subjects

Data subjects have the following rights under GDPR:

- Right to be informed
- Right of access

- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to restrict processing
- Right to data portability
- Right to object
- Rights relating to automated decision-making and profiling

4. Lawful, Fair, and Transparent Processing

Processing of personal data is lawful if at least one of the following applies:

- Consent from the data subject
- Necessary for a contract with the data subject
- Compliance with a legal obligation
- Protection of vital interests
- Performance of a task in the public interest or official authority
- Legitimate interests of the Company, except where overridden by the rights of the data subject

Special category data (e.g., race, health, genetics, biometrics) is processed only if additional legal conditions are met, including explicit consent, obligations in employment or social security law, protection of vital interests, or other lawful exemptions.

5. Purpose Limitation

Gemini Print Solutions only collects and processes personal data for clearly defined and legitimate purposes. All data subjects are informed of how their personal data will be used.

6. Data Minimisation

Only personal data necessary for the stated purpose is collected and processed.

7. Accuracy

Personal data is checked for accuracy upon collection and at regular intervals. Any inaccuracies are corrected or erased without delay.

8. Retention

Personal data is retained only as long as necessary for its purpose. Unneeded data is securely disposed of in accordance with the Company’s Data Retention Policy.

9. Security

All personal data is securely stored and protected against unauthorised access, loss, or damage, using appropriate technical and organisational measures.

10. Accountability and Record-Keeping

Data Protection Officer: Steve Cropper

The Data Protection Officer oversees policy implementation and compliance. The Company maintains records of:

- Purposes of processing
- Categories of data and data subjects
- Data transfers outside the EEA
- Retention periods
- Security measures implemented

11. Data Protection Impact Assessments

For any new processing activities likely to result in high risk to data subjects, the Company carries out Data Protection Impact Assessments, overseen by the Data Protection Officer.

12. Keeping Data Subjects Informed

Data subjects are provided with:

- Purpose and legal basis for processing
- Categories of data collected
- Third-party recipients
- Retention periods
- Rights under GDPR
- How to withdraw consent or complain to the ICO
- Details of any automated decision-making or profiling

13. Data Subject Access Requests (SARs)

Data subjects may request information about their personal data at any time. Requests are normally responded to within 15 working days, extendable by up to three months for complex cases.

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All SARs are handled by the Data Protection Officer, free of charge for normal requests. Additional copies may incur a reasonable fee.

14. Rectification

Data subjects may request corrections of inaccurate or incomplete personal data. The Company will rectify such data within one month, extendable by three months for complex cases, and notify any relevant third parties.

15. Erasure

Data subjects may request erasure if:

- Data is no longer needed
- Consent is withdrawn
- Processing is unlawful
- Legal obligations require it

Erasure requests are fulfilled within one month, extendable by two months for complex cases. Third parties are informed where applicable.

16. Restriction of Processing

Data subjects may request that processing is restricted. Only data necessary to comply with the request will be retained, and third parties are notified where applicable.

17. Data Portability

Where personal data is processed automatically and consent is given, data subjects can receive their data in a machine-readable format (PDF, Excel, Word) and, where feasible, request direct transfer to another controller.

18. Objections

Data subjects may object to processing for legitimate interests, direct marketing, or business purposes. Processing will cease unless overriding legal grounds exist.

19. Automated Decision-Making

Data subjects have the right to challenge automated decisions with significant legal effects, requesting human review or explanation. Exceptions apply where required by contract, law, or explicit consent.

20. Profiling

Personal data may be used for profiling (e.g., customer relationship status or purchase patterns). Clear explanations, statistical procedures, risk minimisation, and security measures are applied to prevent errors or discrimination.

21. Data Collection

Data is collected for legitimate business purposes only. No personal data is sold or shared beyond approved suppliers adhering to GDPR.

22–26. Data Security

Measures include:

- Secure transfers (SFTP, encrypted ZIP)
- Secure storage (passwords, encryption, two-factor authentication, locked storage)
- Secure disposal (as per Data Retention Policy)
- Limited access granted by Director Steve Cropper or Data Protection Officer
- IT security protocols (passwords, software updates, restricted installations)

27. Organisational Measures

- Employees and contractors are trained and supervised in GDPR compliance
- Access to personal data is restricted to necessary personnel
- Policies and procedures are regularly reviewed
- Contractors and third parties are held to the same standards

28. Transfers Outside the EEA

Data transfers outside the EEA occur only under:

- Adequacy decisions by the European Commission
- Appropriate safeguards (contractual clauses, codes of conduct)
- Consent from data subjects
- Legal or contractual necessity

29. Data Breach Notification

All breaches are reported immediately to the Data Protection Officer. High-risk breaches are reported to affected data subjects and the ICO within 72 hours where required.

30. Policy Implementation

Effective from 25 June 2018, updated January 2026.

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

Steve Cropper

Director

Updated: 12th January 2026

Next Review Date: 12th January 2027