

Data Protection (GDPR) Policy

(2024 - 2025)



1. Introduction

Turtle Media and Marketing Ltd ("the Company") recognises the importance of protecting personal data and is dedicated to safeguarding the privacy of individuals. This policy aims to provide transparency on how the Company collects, uses, and protects personal data in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. As a data controller, Turtle Media and Marketing Ltd is responsible for ensuring compliance with data protection laws in all areas of operation, and this policy outlines the commitments the Company makes towards upholding the rights of data subjects.

The Company considers data protection to be fundamental to its operations and holds all employees, contractors, and stakeholders accountable for adhering to this policy. Turtle Media and Marketing Ltd recognises that data protection compliance is essential for maintaining the trust of clients, business partners, and regulatory authorities.

2. Scope of the Policy

This GDPR Policy applies to all processing activities involving personal data collected, stored, or handled by Turtle Media and Marketing Ltd, irrespective of the data subject's nationality or location. The policy covers data collected both directly from individuals (e.g., clients, employees, and marketing leads) and indirectly from third parties (e.g., marketing analytics services).

This policy applies to:

- All employees, contractors, freelancers, and temporary staff who process personal data on behalf of the Company.
- All data processing activities, including data collection, recording, storage, analysis, modification, transfer, disclosure, and disposal of data.
- Any data processed using digital systems, databases, physical records, or any other medium used by the Company.

3. Definition of Key Terms

- **Personal Data:** Any information relating to an identified or identifiable natural person (the "data subject"). This includes names, identification numbers, location data, online identifiers, or any other data that can be linked to an individual.
- **Special Category Data:** A subset of personal data that requires higher levels of protection, including health information, race, religion, genetic data, and political opinions.
- **Data Controller:** Turtle Media and Marketing Ltd, which decides how and why personal data is processed.
- **Data Processor:** A third party that processes personal data on behalf of Turtle Media and Marketing Ltd, such as marketing tools or analytics providers.
- **Data Processing:** Any activity related to personal data, including collection, recording, organising, structuring, storing, adapting, retrieving, using, disclosing, erasing, or destroying data.

4. Legal Basis for Processing Personal Data

Under GDPR, Turtle Media and Marketing Ltd is required to establish a lawful basis for processing personal data. The Company processes data based on the following grounds:

1. **Consent:** Obtained freely and explicitly from the data subject, who may withdraw consent at any time without affecting the lawfulness of prior processing.
2. **Contractual Necessity:** Data processing is required for fulfilling a contract with the data subject or to facilitate requests for services or products prior to entering a contract.
3. **Legitimate Interests:** Processing is based on the Company's legitimate interests, which may include improving service offerings, ensuring network security, or personalising communications. When relying on legitimate interests, the Company ensures that data subjects' rights are not overridden.
4. **Legal Obligation:** Processing is necessary to comply with the Company's legal obligations, such as those related to tax, employment, and reporting to regulatory authorities.

Each processing activity is reviewed to confirm its legal basis, and records are maintained as part of the Company's data protection accountability.

5. Data Collection

Turtle Media and Marketing Ltd is committed to collecting only the minimum necessary data for specific, explicit, and legitimate purposes. The Company collects personal data from various sources, including:

- **Direct Collection:** Obtained directly from individuals through online forms, surveys, and contract negotiations.
- **Automated Collection:** Collected automatically through tracking technologies such as cookies, IP address tracking, and web analytics tools.
- **Third-Party Collection:** Data sourced from partners, such as marketing vendors and lead generation providers, who comply with GDPR standards.

The Company ensures transparency at the point of data collection by providing a clear privacy notice that explains the purpose of data collection, the data subject's rights, and how data will be processed and protected.

6. Purpose of Data Processing

Turtle Media and Marketing Ltd processes personal data solely for purposes that align with business needs, data subject expectations, and legal obligations. These purposes include:

- **Service Delivery:** Ensuring efficient and tailored service delivery, which may involve using contact details, preferences, and purchase history to fulfil requests and personalise interactions.
- **Marketing:** Sending promotional materials, newsletters, and other relevant content based on consent or legitimate interest. Marketing preferences are tracked to ensure compliance with opt-out requests and data subject preferences.
- **Customer Relationship Management (CRM):** Using CRM systems to manage client information and optimise client interactions, relationship history, and account management.
- **Market Research and Analysis:** Using aggregated and anonymised data to improve service offerings and understand market trends without impacting individual privacy.
- **Legal and Regulatory Compliance:** Processing data as required by laws, including tax, audit, and employment obligations.

7. Data Security

The Company prioritises data security through a combination of technical and organisational measures, and all employees are trained to recognise and mitigate security risks. Data security measures include:

- **Technical Protections:** Regular software updates, data encryption, multi-factor authentication, and access controls.
- **Physical Security:** Secure storage solutions, restricted access to sensitive data storage areas, and equipment security measures.
- **Incident Response Plan:** A structured response to any data breach or incident, including rapid investigation, containment, mitigation, and reporting as per legal requirements.
- **Data Access Control:** Access to personal data is limited to those employees and contractors who require it for legitimate business purposes, and access levels are reviewed periodically.

8. Data Retention

Turtle Media and Marketing Ltd retains personal data only for as long as necessary to fulfil the purposes of collection or as legally required. The Company follows a data retention schedule that includes:

- **Client Data:** Retained for the duration of the contractual relationship and archived or deleted within a defined period following contract termination.
- **Marketing Data:** Retained based on consent and periodically reviewed for relevance, with data subject requests for deletion actioned promptly.
- **Employee Data:** Retained in accordance with employment laws and internal HR policies, including statutory minimum periods.
- **Destruction of Data:** Data is securely deleted, shredded, or anonymised, and the Company uses certified data destruction services for physical records when necessary.

9. Data Subject Rights

Turtle Media and Marketing Ltd upholds the rights of data subjects under GDPR. Data subjects can exercise their rights through a simple, accessible process facilitated by the Company's DPO. The rights include:

1. **Right of Access:** Data subjects may request information about their personal data held by the Company, including a description of processing activities and a copy of the data.
2. **Right to Rectification:** Inaccurate data will be corrected upon request to ensure the data held is accurate and up-to-date.
3. **Right to Erasure:** Data subjects may request deletion of personal data if it is no longer needed, consent is withdrawn, or processing is unlawful.
4. **Right to Restrict Processing:** Data processing may be restricted upon request, under circumstances where the accuracy or legality of data processing is contested.
5. **Right to Data Portability:** Data subjects may receive their data in a structured, machine-readable format and may request its transfer to another data controller.
6. **Right to Object:** Data subjects may object to processing based on legitimate interests or direct marketing.

10. Data Sharing and Disclosure

The Company only shares personal data when necessary and with third parties who comply with GDPR standards. Third parties include:

- **Service Providers:** Including marketing platforms, email service providers, and payment processors under GDPR-compliant data processing agreements.
- **Legal Disclosures:** Required disclosures to regulatory or law enforcement agencies as per legal obligations.
- **Data Subject Consent:** When data sharing is outside regular operations, the Company will obtain explicit consent.

11. Cross-Border Data Transfers

Where data is transferred outside the European Economic Area (EEA), the Company ensures that safeguards such as Standard Contractual Clauses, Privacy Shield certification, or other approved mechanisms are in place.

12. Data Breach Notification

In the event of a data breach, the Company follows a structured protocol:

1. **Incident Reporting:** All incidents are promptly reported to the DPO.
2. **Assessment:** The Company assesses the risk to individuals and takes steps to contain and mitigate the breach.
3. **Notification:** If the breach poses a high risk to individuals, the ICO is informed within 72 hours, and affected data subjects are notified.
4. **Documentation:** Details of the breach and actions taken are recorded.

For any enquiries regarding our policy, please feel free to reach out using the contact information provided below.

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Signed by:

Francis Pybis – Director



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