

Lunar Ltd
GDPR Data Protection Policy
Date: 1st November 2024

1. Introduction

This policy outlines the data protection responsibilities of **Lunar Ltd**, a company registered in the UK, with its primary office located at [insert office address]. This policy addresses the rights of employees, clients, and business partners ("data subjects") regarding their personal data under the applicable Data Protection Law.

"Data Protection Law" refers to all current laws regulating the use of personal data, including but not limited to the **UK GDPR** (General Data Protection Regulation), the **Data Protection Act 2018**, and other related legislation.

Lunar Ltd is dedicated not only to adhering to the law but also to fostering a high standard of data privacy, trust, and transparency in all data handling practices.

2. Definitions

- **Data Subject:** An identifiable living individual whose personal data is processed by Lunar Ltd.
- **Data Controller:** Lunar Ltd, as the entity determining the purpose and means of data processing.
- **Data Processor:** Any third party that processes data on behalf of Lunar Ltd.
- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Processing:** Any operation performed on personal data, such as collection, storage, or deletion.
- **Special Category Data:** Personal data revealing racial/ethnic origin, political opinions, religious beliefs, health, etc.

3. Scope


This policy applies to all employees, contractors, and agents of Lunar Ltd who handle personal data as part of their role within the company. Compliance with this policy is mandatory to ensure that data is handled legally, ethically, and securely.

4. Data Protection Principles

All personal data processed by Lunar Ltd must comply with the following principles:

1. **Lawfulness, Fairness, and Transparency:** Data processing must be legal, fair, and transparent to the data subject.
2. **Purpose Limitation:** Data should be collected for specific, legitimate purposes and not used in ways incompatible with those purposes.
3. **Data Minimisation:** Only data necessary for the intended purpose will be collected and processed.
4. **Accuracy:** Personal data must be kept accurate and up-to-date.
5. **Storage Limitation:** Data should not be retained longer than necessary for the purposes for which it was collected.
6. **Integrity and Confidentiality:** Data should be processed securely to prevent unauthorised access or loss.

Revision:	1
Author:	Ian Sibbert
Updated:	November 2024
Issued:	November 2024
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5. Data Subject Rights

Lunar Ltd acknowledges the rights of data subjects under GDPR, which include:

- The right to be informed about data collection and usage.
- The right to access personal data held by Lunar Ltd.
- The right to rectification of incorrect or incomplete data.
- The right to erasure (right to be forgotten).
- The right to restrict processing.
- The right to data portability.
- The right to object to data processing.

6. Lawful, Fair, and Transparent Data Processing

Lunar Ltd will process personal data only if one of the following conditions is met:

- The data subject has given consent.
- Processing is necessary for contract performance.
- Processing is required for compliance with a legal obligation.
- Processing is necessary to protect the vital interests of the data subject or another person.
- Processing is carried out in the public interest or for legitimate interests pursued by Lunar Ltd, except where such interests are overridden by the data subject's rights.

7. Consent

When consent is the lawful basis for processing, Lunar Ltd will ensure that:

- Consent is freely given, specific, informed, and unambiguous.
- Data subjects can withdraw consent at any time.
- Records of consent are maintained.


8. Data Collection and Use

Lunar Ltd collects, holds, and processes personal data for the following purposes:

- **Employee Management:** Managing employee records, payroll, and performance.
- **Client Relationship Management:** Handling customer accounts, inquiries, and contractual obligations.
- **Marketing:** Direct marketing (where consent has been obtained).
- **Business Operations:** Administrative, financial, and legal obligations.

9. Data Security

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Lunar Ltd will ensure that appropriate technical and organisational measures are in place to protect personal data from unauthorised access, processing, loss, or destruction:

- **Access Controls:** Only authorised personnel can access sensitive data.
- **Encryption:** Data transferred electronically is encrypted.
- **Secure Storage:** Personal data stored on physical and digital media is secured.
- **Training:** All employees receive regular data protection training.

10. Data Retention

Lunar Ltd will retain personal data only for as long as necessary. Once personal data is no longer needed, it will be securely disposed of.

11. Third-Party Processors

Lunar Ltd may share personal data with third-party processors who support our business operations, subject to strict agreements ensuring GDPR compliance.

12. Data Breach Notification

In the event of a data breach:

- The Data Protection Officer will assess the risk to data subjects and report significant breaches to the Information Commissioner’s Office (ICO) within 72 hours.
- Affected data subjects will be informed if the breach presents a high risk to their rights and freedoms.

13. Data Protection Officer (DPO)

[Insert Name], the designated Data Protection Officer, is responsible for overseeing GDPR compliance at Lunar Ltd. Any data protection queries should be directed to [Insert Email Address].

14. Review and Updates

This policy will be reviewed annually to ensure ongoing compliance with GDPR and data protection standards.

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