

AVK-COM-PL-004

Data Protection Policy

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1.4	07/02/2025	Annual Review	Compliance	CRO
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Document Number	Version	Date	Document Owner	Control Status	Page No.
AVK-COM-PL-004	1.5	05/06/2026	Compliance	Uncontrolled when printed and download	Page 1 of 8

Content

1. Purpose	3
2. Scope	3
3. Definitions	3
4. Data Protection Legislation	4
5. Our Responsibility	4
5.1 Acting as a Controller	4
5.2 Acting as a Processor	5
6. Data Quality	5
7. Rights of Individuals	5
8. Data Protection by Design and Default	6
9. Automated Individual Decisions and Profiling	6
10. Security and Confidentiality	6
11. Personal Data Breaches	7
12. Third Party Processors and Data Transfers	7
13. Training	7
14. Compliance	7
15. Dealing with Complaints	8
16. Updates to this Policy	8

Document Number	Version	Date	Document Owner	Control Status	Page No.
AVK-COM-PL-004	1.5	05/06/2026	Compliance	Uncontrolled when printed and download	Page 2 of 8

1. Purpose

This Data Protection Policy sets out the minimum data protection requirements that apply within the AVK group of companies (**AVK Group, we, us and our**).

This policy should be read alongside our other data related policies, such as our AVK-COM-PL-032 Data Subject Rights Policy and our AVK-COM-PL-041 Personal Data Breach Response Plan.

2. Scope

This policy applies to all AVK Group companies in all locations and their personnel including employees, workers, contractors, agency workers, consultants, directors, members and others (**staff, you and your**). It is essential that all our staff members are familiar with this policy and comply with all of its terms.

3. Definitions

The following terms in this policy have the meanings set out next to them.

“Controller” means the natural or legal person which alone or jointly with others determines the purposes and means of the processing of personal data.

“Criminal convictions data” means data relating to an individual's criminal convictions and offences.

“Data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, disclosure, or access of personal data transmitted, stored or otherwise processed by us.

“Data Protection Officer (DPO)” means the individual responsible for advising on and monitoring the AVK Group’s compliance with data protection laws.

“Personal data” means any data relating to an identified or identifiable natural person who can be directly or indirectly identified from that data.

“Processing” means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

“Processor” means a natural or legal person which processes personal data on behalf of a controller.

“Special category data” means personal data revealing an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership. It also includes genetic data, biometric data (where used for identification purposes) and data concerning an individual’s health, sex life or sexual orientation.

Document Number	Version	Date	Document Owner	Control Status	Page No.
AVK-COM-PL-004	1.5	05/06/2026	Compliance	Uncontrolled when printed and download	Page 3 of 8

4. Data Protection Legislation

The AVK Group will always comply with data protection legislation and will ensure that our collection and use of personal data is carried out in accordance with data protection laws. This includes, where applicable:

- The UK General Data Protection Regulation (UK GDPR).
- The EU General Data Protection Regulation (EU GDPR).
- National laws that relate to the protection of personal data.

Where any AVK Group company is subject to more than one data protection regime that impose different requirements, the relevant company will comply with all applicable requirements and, where appropriate, apply the more stringent requirement.

5. Our Responsibility

Many data protection laws around the world make an important distinction between controllers and processors.

An organisation is deemed to be a controller when it is responsible for determining how and why personal data is processed. Controllers make decisions about which individuals they will collect personal data about, why and how they will process that personal data and with whom they will share personal data.

Processors, on the other hand, process personal data only on the instructions of a controller. When acting as a processor, an organisation has more limited direct obligations under data protection legislation compared with when it is acting as a controller.

Whether an organisation acts as a controller or a processor when processing personal data is a question of fact. For example, an organisation will be acting as a controller when it processes its own staff data; whilst a cloud storage provider will usually be acting as a processor when it processes customer personal data as part of the services it provides to its customers.

We will only process special category data and criminal convictions data where we consider it necessary to do so and where applicable data protection laws permit it.

5.1 Acting as a Controller

In most instances where AVK Group companies process personal data, they will each determine how and why they process that personal data.

As the controller that determines how and why we process the personal data that we hold, we are primarily responsible for ensuring that we comply with applicable data protection legislation when we process personal data. This includes ensuring that:

- We explain to individuals (through our privacy notices and other means) the types of personal data that we process, how their personal data will be processed and the purposes for which their personal data will be processed.
- All processing satisfies one of the lawful conditions for processing required by data protection law.
- We collect individuals' personal data for specified, explicit and legitimate purposes and do not further process it in a manner that is incompatible with the purposes for which it was collected.

Document Number	Version	Date	Document Owner	Control Status	Page No.
AVK-COM-PL-004	1.5	05/06/2026	Compliance	Uncontrolled when printed and download	Page 4 of 8

- If we want to process personal data for a purpose other than that for which it was originally collected, we must assess whether the new purpose is compatible with the original purpose.
- We will only process special category data and criminal convictions data where we consider it necessary to do so and where data protection laws permit it.

5.2 Acting as a Processor

In limited circumstances an AVK Group company may process certain personal data for and on behalf of another entity, rather than for its own purposes. This would be the case, for example, where an AVK Group company processes personal data on behalf of another AVK Group company as part of an intra-group services arrangement.

Not all parts of this policy will apply in the same way where an AVK Group company processes personal data for and on behalf of another person – i.e., as a processor.

If you are unsure in a particular instance if we are processing personal data as a controller or processor, please contact the Data Protection Officer at DPO@avk-seg.com for advice and assistance.

6. Data Quality

We will:

- Keep personal data accurate and up to date. We encourage individuals to inform us when their personal information changes.
- Rectify any inaccuracy in the personal data we hold promptly upon becoming aware of the inaccuracy.
- Only keep personal data that is adequate, relevant and limited to the purpose for which the personal data is processed.
- Only keep personal data for as long as is necessary for the purpose(s) for which it is processed, taking into account any applicable legal and regulatory requirements to retain the data for a minimum period, limitation periods for taking legal action, good practice and business purposes, in line with our data retention policies and procedures.

7. Rights of Individuals

We will respect and comply with the rights individuals have under data protection law in respect of the personal data we process.

In the event that any member of staff or department receives a data subject rights request directly from an individual (for example, a contractor or a job applicant) they should forward it immediately to DPO@avk-seg.com.

Requests may include a request for access to personal data (DSAR), a request to rectify or complete personal data they consider to be inaccurate or incomplete (rectification request), or a request to delete personal data (erasure request). On receipt of a request, we will handle it in accordance with our Data Subject Rights Policy and data protection law. The Data Protection Officer will assess the request and determine whether, and to what extent, the relevant AVK Group company can comply with it.

Document Number	Version	Date	Document Owner	Control Status	Page No.
AVK-COM-PL-004	1.5	05/06/2026	Compliance	Uncontrolled when printed and download	Page 5 of 8

We will not use individuals' personal data for marketing purposes where they have indicated to us that they do not want their personal data to be used for such purposes.

8. Data Protection by Design and Default

We will implement the principle of data protection by design and by default across our business, for example when we are commissioning new platforms or undertaking new projects. The AVK Group will:

- Take into account data protection compliance in all that we do.
- Carry out data protection impact assessments to assess the impact of processing operations on the protection of personal data where we think the processing is likely to result in a high risk to the rights and freedoms of individuals.
- Look to use anonymous data where practicable.

Look to ensure that our use of personal data is not excessive and limited to only what we need to provide our services and run our business properly.

9. Automated Individual Decisions and Profiling

Generally, we do not use profiling (where an electronic system uses personal data to try and predict something about an individual) or automated decision-making (where an electronic system uses personal data to make a decision about an individual without human intervention) in our business.

If we do use profiling or automated decision-making, we will only do so in compliance with data protection law.

10. Security and Confidentiality

We will take appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, disclosure or access and against all other unlawful forms of processing.

Our staff members are under a duty to keep personal data confidential and may only process personal data in accordance with this policy. Any staff member who breaches this policy may be subject to disciplinary action, up to and including dismissal.

Document Number	Version	Date	Document Owner	Control Status	Page No.
AVK-COM-PL-004	1.5	05/06/2026	Compliance	Uncontrolled when printed and download	Page 6 of 8

11. Personal Data Breaches

All staff must be aware of the importance of promptly reporting any actual or suspected personal data breaches.

If a staff member becomes aware of any breach, or potential breach, of data protection laws, or any actual or suspected personal data breach, they must immediately notify the Data Protection Officer at DPO@avk-seg.com.

The AVK Group maintains a Personal Data Breach Response Policy, which sets out the detailed steps to:

- Investigate and assess the impact of the breach.
- Take remedial steps to minimise any adverse impact.
- Determine whether the breach should be reported to the relevant supervisory authority and/or affected individuals.

All breaches will be handled in line with the Personal Data Breach Response Policy, as well as other Data Protection and Security Policies.

12. Third Party Processors and Data Transfers

If any AVK Group company uses a third-party processor, including another AVK Group company, to process personal data on its behalf, it will enter into a written contract that complies with data protection law and includes contractual commitments requiring the third party to act only on documented instructions and to implement appropriate technical and organisational measures to protect the personal data.

Where any AVK Group company makes an international transfer of personal data, including to another AVK Group company or to a third-party service provider, it will ensure that it complies with data protection laws. This may include, as applicable, ensuring that an appropriate transfer mechanism is in place and that any required transfer assessment and supplementary measures are implemented.

We will not share personal data with third parties without ensuring that we have taken all steps required by data protection law to adequately protect the personal data.

13. Training

We will provide appropriate training to our staff members to ensure they are aware of their and our obligations under this policy and data protection laws. Completion of training is mandatory.

14. Compliance

Compliance with this policy is everyone's responsibility, with the Legal and Compliance Team overseeing overall data protection compliance.

Document Number	Version	Date	Document Owner	Control Status	Page No.
AVK-COM-PL-004	1.5	05/06/2026	Compliance	Uncontrolled when printed and download	Page 7 of 8

15. Dealing with Complaints

We will look to deal promptly and fairly with any complaints we receive about how we process personal data or our compliance with this policy, in accordance with our AVK-COM-PR-008 Complaints Procedure. We will liaise with colleagues from relevant business and support departments as necessary to deal with such complaints.

16. Updates to this Policy

This policy may be updated from time to time. We will communicate any substantive changes to this policy to all staff members.



Ben Pritchard
CEO (Signed June 2026)
On behalf of the AVK Senior Leadership Team

Document Number	Version	Date	Document Owner	Control Status	Page No.
AVK-COM-PL-004	1.5	05/06/2026	Compliance	Uncontrolled when printed and download	Page 8 of 8