

Data Protection Policy

This policy and our supporting Data Protection Procedure set out how Enable Investment Holdings Limited seek to protect personal data in accordance with the General Data Protection Regulations (2018) and the Data Protection Act (2018). Personal data is any information relating to identifiable individuals such as name, home address, email, phone number or an ID number. Sensitive personal data is personal data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, physical or mental health conditions, criminal offences, or related proceedings. Any use of personal or sensitive personal data will be strictly controlled in accordance with this policy and supporting procedures.

We hold personal and sensitive data about our employees, clients, suppliers, consultants, stakeholders and other individuals for a variety of business purposes, including the following:

- Compliance with our legal, regulatory and corporate governance obligations
- Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- Operational reasons, such as recording transactions, training and quality control, ensuring the confidentiality of commercially sensitive information
- Investigating complaints
- Conducting HR related checks such as references, staff absences, training, sentinel compliance, monitoring medicals, declared medication, drugs and alcohol tests, monitoring staff conduct
- Ensuring safe working practices and monitoring and managing employees' access to systems and facilities
- Improving our services

The Enable Group complies with the Data Protection Principles when processing personal data. These are set out in the General Data Protection Regulations 2018 and state that data must be:

- Processed fairly and lawfully
- Obtained for one or more specified and lawful purpose(s)
- Adequate, relevant and not excessive in relation to the purpose(s) for which this processing is to take place
- Accurate and, where necessary, kept up to date
- Not kept longer than necessary for the purpose(s) it was obtained
- Processed in line with data subjects' rights
- Secure, with appropriate technical and procedural measures to protect against unauthorised or unlawful processing and accidental loss or destruction; and
- Not transferred to people or organisations situated in countries without adequate protection

The regulations include the following rights for individuals around their personal data:

- The right to be informed of why their data is being used and who it will be shared with
- The right of access when requested
- The right to rectification or completion if found to be incomplete or inaccurate
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object to the processing
- The right to object to automated decision-making including profiling

Employees must notify their line manager or the HR Manager when their personal data changes.

The Enable Group has a designated Data Protection Officer (DPO) who must be consulted before any significant new data processing activity is initiated to ensure that relevant compliance steps can be addressed.

This Policy Statement and associated IMS procedures apply to all activities undertaken by the Enable Group. All employees are required to comply with this policy. It does not form part of any employee's contract of employment, but it is a condition of employment that employees abide by the rules and policies made by the Company. This policy may be amended at any time, and any breach of this policy will be taken seriously and may result in disciplinary action.

All employees will be briefed on this policy during the induction process and following any subsequent amendments. It will be accessible to all interested parties via SharePoint, noticeboards, the company website and is available on request. The Directors of the Enable Group are committed to this policy and are responsible for ensuring its arrangements are implemented and upheld. It will be reviewed annually and revised as often as may be deemed appropriate.

Shane O'Halloran
Managing Director
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