



STUDIO NINE GROUP LTD

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DATA PROTECTION AND GDPR POLICY

Policy Owner: Elizabeth Barnett, Director

Date Adopted: June 2026

Review Date: June 2027

☐ Policy Statement

Studio Nine Group Ltd is committed to protecting the privacy, confidentiality and security of personal information. We recognise our responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and are committed to processing personal data lawfully, fairly and transparently.

This policy outlines how Studio Nine collects, stores, uses and protects personal information in the course of delivering consultancy, workshops, training, communication support, business support services and related activities.

☐ Scope

This policy applies to all personal information processed by Studio Nine Group Ltd, including information relating to:

- Clients and customers
- Workshop and event attendees
- Business support programme participants
- Suppliers and contractors
- Prospective customers
- Website enquiries and mailing list subscribers

☐ Data Protection Principles

Studio Nine will ensure that personal data is:

- Processed lawfully, fairly and transparently
- Collected for specified, legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date where appropriate
- Retained only for as long as necessary
- Processed securely to prevent unauthorised access, loss or disclosure
- Managed in accordance with individuals' rights under UK GDPR

☐ **Personal Information We May Process**

Depending on the nature of the service provided, Studio Nine may process:

- Names
- Business names
- Email addresses
- Telephone numbers
- Postal addresses
- Social media account information
- Booking information
- Attendance records
- Feedback forms
- Project notes
- Communication records
- Website enquiry information

Studio Nine does not routinely process special category personal data unless necessary for a specific service requirement and with an appropriate lawful basis.

☐ **Lawful Basis for Processing**

Studio Nine processes personal information under one or more of the following lawful bases:

- Consent
- Contract
- Legal obligation
- Legitimate interests

Personal information will only be used for purposes connected to service delivery, communication, administration, reporting, business support activities and legal or regulatory obligations.

☐ **Data Security**

Studio Nine takes appropriate technical and organisational measures to protect personal information.

These measures include:

- Password protected devices and accounts
- Secure cloud-based storage systems
- Restricted access to information
- Secure email communication
- Use of reputable third-party software providers
- Regular software and device updates
- Secure disposal of information no longer required

Personal information is only accessible to authorised individuals who require access for legitimate business purposes.

☐ **Data Retention**

Personal information will only be retained for as long as necessary to fulfil the purpose for which it was collected, comply with contractual requirements or meet legal and regulatory obligations.

When information is no longer required, it will be securely deleted, destroyed or anonymised.

☐ **Sharing Information**

Studio Nine does not sell personal information.

Information may be shared where necessary with:

- Funding bodies or programme partners where reporting requirements apply
- Professional advisers such as accountants or legal advisers
- Approved software providers used to deliver services
- Regulatory authorities where required by law

Any sharing of information will be limited to what is necessary and appropriate.

☐ **Individual Rights**

Individuals have the right to:

- Request access to their personal information
- Request correction of inaccurate information
- Request erasure of information where appropriate
- Request restriction of processing
- Object to processing where applicable
- Request transfer of information where applicable
- Withdraw consent where processing is based on consent

Requests will be handled promptly and in accordance with applicable legislation.

☐ **Data Breaches**

Any actual or suspected data breach will be investigated promptly.

Where required, Studio Nine will take appropriate remedial action and notify the Information Commissioner's Office (ICO) and affected individuals in accordance with legal requirements.

☐ Responsibility

Overall responsibility for data protection and compliance with this policy rests with:

Elizabeth Barnett
Director
Studio Nine Group Ltd

All individuals working on behalf of Studio Nine are expected to handle information responsibly and comply with this policy.

☐ Review

This policy will be reviewed annually or sooner if there are significant changes to legislation, business operations or data processing activities.

Signed:

Elizabeth Barnett
Director

Studio Nine Group Ltd

Date: June 2026