

## Global Data Protection Policy

### 1. Purpose

To ensure that:

- We collect and use personal data legally and responsibly.
- People can trust us to respect their privacy and handle their personal data carefully.

### 2. Definitions

Word	Definition
<b>Personal Data</b>	Any information identifying an individual or from which an individual may be identified either by that information alone, or in combination with other data (ie, directly or indirectly). Personal data can be factual (eg, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.
<b>Data Subjects</b>	People to whom the personal data relates. This can include customers, suppliers, business contacts, employees and other people JM has a relationship with or may need to contact.
<b>Personal Data Breach</b>	A breach of security resulting in the loss of, unauthorised access to, disclosure or acquisition of personal data.
<b>Processing or process</b>	Any activity that involves the use of personal data. It includes obtaining, recording, holding the data, carrying out any operation or set of operations on the data (eg, organising, amending, retrieving, using, disclosing, erasing, or destroying it). Processing also includes transmitting or transferring personal data to third parties or other locations.
<b>Privacy Impact Assessment (PIA)</b>	An assessment used to identify and reduce risks of a data processing activity.
<b>Privacy Notices</b>	Legally required documents that explain the purposes and usage of personal data.

### 3. Policy

The following principles and requirements apply whenever we process personal data:

- We will only process personal data when we have a legitimate business reason or a legal requirement to do so.
- We will be open and transparent with people about the way we use their personal data.
- We will only use personal data for the purpose for which we collected it, unless we have the individual's consent to use it for a new purpose or we have a legal obligation to do so.
- We will only collect the amount of personal data that we need to conduct our business.
- We will take steps to ensure any personal data we collect is accurate and kept up to date.
- We will not keep personal data for longer than we need it.
- We will keep personal data secure and limit the people who can access it.
- We will ensure any third party with whom we share personal data will take appropriate steps to protect it.
- We will respect the rights of the people to whom the data relates.

If there is a conflict between this policy and local laws, you must comply with the strictest requirement.