

#### GDPR AND DATA REMOVAL POLICY

#### 1. Introduction

MALYK LTD is committed to protecting the privacy and personal data of our customers, employees, and stakeholders. This policy outlines our adherence to the General Data Protection Regulation (GDPR) and provides guidance on how individuals can exercise their right to have their personal data removed.

### 2. Scope

This policy applies to all personal data processed by MALYK LTD, including data relating to customers, employees, contractors, and third parties.

# 3. GDPR Compliance

MALYK LTD complies with the principles set out in the GDPR:

# 1. Lawfulness, Fairness, and Transparency:

• We process personal data lawfully, fairly, and in a transparent manner.

## 2. Purpose Limitation:

• We collect personal data for specified, explicit, and legitimate purposes and do not process it further in a manner incompatible with those purposes.

#### 3. Data Minimization:

 We ensure that personal data is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

#### 4. Accuracy:

• We take reasonable steps to ensure that personal data is accurate and kept up to date.

# 5. Storage Limitation:

 We keep personal data in a form that permits identification of data subjects for no longer than necessary.

# 6. **Integrity and Confidentiality:**

 We process personal data in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage.

# 7. Accountability:

• We are responsible for, and can demonstrate, compliance with these principles.

### 4. Data Subject Rights

Under GDPR, individuals have the following rights regarding their personal data:

### 1. Right to Access:

o Individuals can request access to their personal data and obtain information about how we process it.

# 2. Right to Rectification:

 Individuals can request the correction of inaccurate or incomplete personal data.

# 3. Right to Erasure (Right to be Forgotten):

 Individuals can request the deletion of their personal data under certain conditions.

# 4. Right to Restrict Processing:

 Individuals can request the restriction of processing their personal data under certain conditions.

### 5. Right to Data Portability:

 Individuals can request the transfer of their personal data to another organization.

# 6. Right to Object:

Individuals can object to the processing of their personal data under certain conditions.

# 7. Rights Related to Automated Decision-Making and Profiling:

 Individuals can object to decisions based solely on automated processing, including profiling.

### 5. Data Removal Request Procedure

To request the removal of personal data, individuals should follow these steps:

#### 1. Submit a Request:

 Requests can be submitted via email to info@malyk.co.uk or by post to our company address. The request should include the individual's name, contact information, and a detailed description of the data to be removed.

#### 2. Verification:

• We may need to verify the identity of the individual making the request to ensure the security of the personal data.

#### 3. Evaluation:

• We will evaluate the request to determine if it meets the conditions for erasure under GDPR. This includes assessing whether the data is no longer necessary for the purposes for which it was collected or processed and whether the individual has withdrawn their consent (if consent was the legal basis for processing).

## 4. **Response:**

 We will respond to the request within one month of receipt. If the request is complex or numerous, we may extend the response time by up to two additional months, and we will inform the individual of the extension and the reasons for the delay.

#### 5. Action:

 If the request is approved, we will delete the personal data and inform the individual of the action taken. If the request is denied, we will provide an explanation and inform the individual of their right to lodge a complaint with a supervisory authority.

### **6. Data Protection Officer (DPO)**

MALYK LTD has appointed a Data Protection Officer (DPO) to oversee GDPR compliance and handle data protection queries and concerns. The DPO can be contacted at info@malyk.co.uk.

## 7. Data Security

We implement appropriate technical and organizational measures to protect personal data from unauthorized access, use, or disclosure. This includes regular security assessments, encryption, access controls, and staff training.

# 8. Record Keeping

MALYK LTD maintains records of all data processing activities, including data removal requests, to demonstrate compliance with GDPR.

# 9. Policy Review

This policy will be reviewed annually and updated as necessary to ensure its continued effectiveness and compliance with GDPR and other relevant legislation.

Imran, Founder MALYK LTD

Date: 1st July 2024