

Data Protection



This policy does not form part of any Employee's contract of employment and it may be amended at any time. The Company may also vary any parts of this policy, including time limits, as appropriate to any case.

1. General Statement

- 1.1 The purpose of this policy is to ensure that Kingspan Light + Air (UK & Ireland) Limited (KLA) complies with General Data Protection Regulations and The Data Protection Act 2018 when processing personal data. This policy describes how this personal and sensitive personal data must be collected, handled and stored.
- 1.2 The objective of this policy is to set out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.
- 1.3 We need to collect personal information about people with whom it deals in order to carry out its business and provide its services. Such people include customers, suppliers, employees (present, past and prospective) and other business contacts. The information includes name, address, email address, date of birth, private and confidential information, sensitive information. In addition, we may occasionally be required to collect and use certain types of such personal information to comply with the requirements of the law.

2. Policy statement

- 2.1 The Company will take reasonable and proportionate measures to ensure that it protects personal data against accidental or deliberate misuse, damage or destruction. It is also committed to a policy of protecting the rights and freedoms of all individuals, in relation to the processing of their personal data, in compliance with Data Protection legislation.
- 2.2 This policy applies regardless of where the personal data is held or whether it is held manually or electronically.
- 2.3 The lawful and proper treatment of personal information by KLA is extremely important to the success of our business and to maintain the confidence of our clients and employees. We ensure that the Company treats personal information lawfully and correctly.

3. Responsibility for the policy

- 3.1 The Senior Management Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The Company has appointed the Marketing Manager as the Data Protection Officer (DPO) who will endeavour to ensure that all personal data is processed in compliance with this Policy.
- 3.3 The IT Director (Kingspan) is responsible for ensuring all systems, services and equipment used for storing data meet acceptable security standards. This includes establishing and maintaining appropriate technical and organisational measures such as network and endpoint firewalls, encryption of data at rest and in transit, secure configuration

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management, and multi-factor access controls. The IT Director (Kingspan) is responsible for making sure arrangements are in place for data backup, disaster recovery, and incident response to protect sensitive and confidential material from loss, unauthorised access, or corruption.

All staff handling personal or sensitive data must complete GDPR training upon induction and annually thereafter to ensure awareness of these responsibilities.

These controls and procedures are implemented in accordance with Kingspan IT Manual v5, which sets out the technical standards, firewall configurations, encryption protocols, and incident management procedures that support this policy.

- 3.4 Everyone who works for or with the business has responsibility for ensuring data is collected, stored and handled appropriately. Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.
- 3.5 Staff members are responsible for ensuring that all the personal data the Company holds about them in connection with their employment is accurate and up to date;

4. Principles of Data Protection

- 4.1 We adhere to the principles of the General Data Protection Regulation (GDPR). In accordance with these principles personal data shall be:
 - 1. Be processed fairly and lawfully;
 - 2. Be obtained only for specific, lawful purposes;
 - 3. Be adequate, relevant and not excessive;
 - 4. Be accurate and kept up to date;
 - 5. Not be held for any longer than necessary;
 - 6. Processed in accordance with the rights of data subjects;
 - 7. Be protected in appropriate ways;
 - 8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.
- 4.2 These principles apply to data relating to any living individual who can be identified by the personal data which is held on a computer or in manual files. This can include, but is not limited to data such as:
 - a. Name, address and telephone number;
 - b. Date of birth;
 - c. Marital Status; and
 - d. Employment information.

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Staff who process and use any personal data in the course of their duties will ensure these principles are followed at all times.

- 4.3 In accordance with principles 1, 2 and 3, personal data shall only be collected fairly and lawfully to the extent required for the specified purpose of carrying out a specific job role. Under no circumstances will personal data be collected, used or processed for reasons outside of this.
- 4.4 In accordance with principles 4, 5 and 6, the Company will ensure that the personal data it holds is accurate and up to date and where necessary review the data periodically and not hold it any longer than necessary. The Company and all staff commit to taking adequate measures against unauthorised or unlawful processing of personal data and against any accidental loss or destruction of, or damage to, such data.

5. Compliance with the policy

- 5.1 All employees and consultants must read, understand and comply with this policy.
- 5.2 The DPO must be informed when processing personal data for a new purpose, transfer personal data to a new data processor or undertake any significant changes to the management or handling of personal data.
- 5.3 Employees and consultants are responsible for ensuring that all the personal data the Company holds about them in connection with their employment or retainer is accurate and up to date;
- 5.4 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager and the DPO immediately.

6. Disclosing data for other reasons

- 6.1 In certain circumstances, the GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.
- 6.2 Under these circumstances, the Company will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Divisional Risk Director and from the company's legal advisers where necessary.

7. Data Subjects Rights

- 7.1 Under the regulations individuals have a right to inspect or request all personal information held about them. This can include, for example, the contents of personnel files, training records etc. Data subjects might include staff, job applicants, consultants, clients and members of the public.
- 7.2 The Company is committed to the management of such requests and any individual wishing to obtain personal information about themselves must contact the DPO at KLAUK.dpo@kingspan.com. The DPO will aim to provide the relevant data within 14 days.

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The DPO will always verify the identity of anyone making a subject access request before handing over any information.

8. Privacy statement

- 8.1 Where personal data is being initially collected or used for a further purpose(s) then data subjects need to be informed through a Privacy Notice, how their personal data will be used by the Company.

9. Communication and awareness of this policy

- 9.1 This document will be made available to all employees via the intranet site.
- 9.2 Training on this policy, and the importance of complying with the key GDPR compliance obligations including the principles, roles, responsibilities and processes will be provided to all employees.

10. Breaches of this policy

- 10.1 Compliance with the policies and procedures laid down in this document will be monitored via the Quality & Compliance team, together with independent reviews by both Internal and External Audit. In the event you become aware of any breach of this policy, please contact the DPO at KLAUK.dpo@kingspan.com.
- 10.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 10.3 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

11. Review of this policy

- 11.1 This policy will be reviewed by the Senior Leadership Team on a regular basis (at least annually) and may be amended from time to time.

12. Approval

This document was reviewed and verified for compliance with UK GDPR and the Data Protection Act 2018 by the Data Protection Officer and formally approved by the Managing Director on behalf of Kingspan Light + Air (UK & Ireland) Limited (KLA).

A handwritten signature in black ink, appearing to read "Holly", enclosed within a large, hand-drawn oval.

Reviewed by:
Samantha Holly, Data Protection Officer
Date: 1 September 2025

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Approved by:
Matt Hicks, Managing Director
Date: 1 October 2025

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