

1. Purpose

This policy defines how Hardium Ltd protects personal data processed as part of its operations and consultancy services.

Hardium is committed to lawful, fair and transparent processing of personal data and to safeguarding the rights of individuals.

2. Scope

This policy applies to all personal data processed by Hardium, including data relating to:

- ✓ Employees and associates
- ✓ Clients and contacts
- ✓ Suppliers and partners
- ✓ Regulatory and professional interactions

3. Information Security Principles

Hardium processes personal data in accordance with the UK GDPR principles:

- ✓ Lawfulness, fairness and transparency
- ✓ Purpose limitation
- ✓ Data minimisation
- ✓ Accuracy
- ✓ Storage limitation
- ✓ Integrity and confidentiality
- ✓ Accountability

Personal data is processed only where there is a lawful basis and only for legitimate business purposes.

4. Controls and Measures

Hardium implements appropriate controls including:

- ✓ Use of secure, UK-hosted cloud services (e.g. Microsoft 365)
- ✓ Multi-factor authentication for email and core systems
- ✓ Strong password management and device access controls
- ✓ Encryption of devices where practicable
- ✓ Controlled access based on role and need
- ✓ Secure handling and transfer of client information
- ✓ Regular backup of critical information

Hardium avoids unnecessary data replication and limits data access to what is required for delivery.

5. Incident Management

Any actual or suspected information security incident must be reported promptly to the Director.

Incidents will be assessed, contained, investigated and, where required, reported to affected parties or authorities in line with legal obligations.



6. Roles & Responsibilities

Founder & Director

- ✓ Overall accountability for information security
- ✓ Approval of this policy
- ✓ Incident oversight

All Personnel and Associates

- ✓ Comply with this policy
- ✓ Protect information under their control
- ✓ Report concerns or incidents promptly

7. Review

This policy is reviewed annually or following significant change, incident or regulatory development.

8. Approval

David Hardy

Founder & Director

Hardium Ltd



