

Innervation Trust/iSingPOP Data Protection Policy (V1)

1. Introduction

At iSingPOP, we are committed to protecting the privacy and confidentiality of personal data provided to us by our users, clients, and partners. This Data Protection Policy outlines our approach to data protection, including the collection, use, storage, and disclosure of personal data in accordance with relevant data protection laws and regulations.

2. Scope

This policy applies to all personal data collected, processed, and stored by iSingPOP, whether electronically or in hard copy format. It applies to all employees, contractors, and third-party service providers who have access to personal data in the course of their duties.

3. Principles

iSingPOP adheres to the following principles in relation to data protection:

- **Lawfulness, fairness, and transparency:** We will process personal data lawfully, fairly, and transparently, and will ensure that individuals are aware of how their data is being used.
- **Purpose limitation:** We will only collect and process personal data for specified, explicit, and legitimate purposes, and will not use it for any other purpose without obtaining further consent.
- **Data minimisation:** We will only collect and process personal data that is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- **Accuracy:** We will take reasonable steps to ensure that personal data is accurate and up to date, and will rectify or erase any inaccurate data without delay.
- **Storage limitation:** We will not keep personal data for longer than is necessary for the purposes for which it is processed.
- **Integrity and confidentiality:** We will process personal data in a manner that ensures its security, including protection against unauthorised or

unlawful processing, and against accidental loss, destruction, or damage.

4. Data Collection and Use

We collect personal data for the following purposes:

- To provide our services to users and clients.
- To communicate with users, clients, and partners.
- To improve and personalise our services.
- To comply with legal and regulatory requirements.

We only collect personal data that is necessary for these purposes, and we will obtain consent where required by law.

5. Data Retention

iSingPOP takes data retention seriously to ensure the privacy and security of all users. Our data retention policy is designed to adhere to relevant regulations and best practices. We only retain personal data for as long as necessary to fulfil the purposes for which it was collected, including providing our services, communicating with users, and improving our offerings. Once data is no longer needed, it is securely disposed of or anonymised to prevent identification. Additionally, we regularly review our data retention practices to ensure compliance with evolving regulations and to maintain the trust of our users.

6. Data Security

We implement appropriate technical and organisational measures to ensure the security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage. We restrict access to personal data to authorised personnel only, and we regularly review and update our security measures to ensure their effectiveness.

7. Data Disclosure

We may disclose personal data to third parties in the following circumstances:

- Where we are required to do so by law.
- Where we have obtained consent from the individual concerned.
- Where it is necessary for the performance of a contract with the individual concerned.
- Where it is necessary for the purposes of legitimate interests pursued by iSingPOP or by a third party.

We will not disclose personal data to third parties for marketing purposes without obtaining explicit consent.

8. Data Subject Rights

Individuals have the following rights in relation to their personal data:

- The right to access their personal data.
- The right to rectify or erase their personal data.
- The right to restrict or object to the processing of their personal data.
- The right to data portability.
- The right to withdraw consent at any time.

We will respond to requests from individuals to exercise their rights in accordance with current UK data protection/GDPR regulations (general data protection regulations).

9. Data Breach Notification

In the event of a data breach involving personal data, we will notify the relevant supervisory authority and affected individuals in accordance with applicable data protection laws and regulations.

10. Systems and Security

iSingPOP prioritises robust systems and security measures to safeguard all aspects of our operations. Our systems are meticulously designed and continuously monitored to ensure the confidentiality, integrity, and availability of data. Access controls are strictly enforced, with access granted only to authorised personnel, utilising strong authentication mechanisms. We adhere to stringent data protection protocols, including encryption and regular backups, to mitigate the risk of data breaches and loss. With a dedicated incident response plan in place and a commitment to compliance with relevant regulations, iSingPOP remains steadfast in our efforts to uphold the highest standards of systems and security.

11. Compliance Monitoring

We regularly review and monitor our data protection practices to ensure compliance with this policy and applicable data protection laws and regulations.

12. Contact Information

If you have any queries or concerns relating to our data protection practices or this policy, please email Lorraine Pearson, Office Manager, lorraine.pearson@isingpop.com.

13. Changes to this Policy

We reserve the right to update or amend this policy from time to time to reflect changes in our data protection practices or applicable laws and regulations. Any changes will be posted on our website and communicated to affected individuals as appropriate.

14. Data Protection and Employees

All employees should also refer to the Employment Handbook for further data privacy information as it relates to your employment.

This Data Protection Policy was last reviewed and approved in April 2025.