

AFSSA™

Annual Floor Safety Standard Assurance

DATA PROTECTION & GDPR POLICY

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1. Purpose

This Data Protection and GDPR Policy sets out how AFSSA collects, uses, stores, protects and disposes of personal data in connection with its assessment and assurance services.

AFSSA is committed to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy applies to all personal data processed by AFSSA, including data relating to clients, site contacts, assessors and any other individuals whose data is handled in connection with AFSSA activity.

2. Scope

This policy applies to all personal data processed by AFSSA in connection with:

- Client enquiries, proposals and contracts
- Site assessments and assessment reporting
- Certificate and document issue
- Client communication and relationship management
- Assessor records and administration
- Marketing and outreach activity

3. Data Controller

AFSSA acts as the data controller for personal data processed in connection with its services. The data controller is responsible for ensuring that AFSSA complies with its obligations under UK GDPR and the Data Protection Act 2018.

The data controller is Sonny Webb, Founder, AFSSA.

4. Principles of Data Protection

AFSSA processes personal data in accordance with the following principles:

- Lawfulness, fairness and transparency — personal data is processed lawfully, fairly and transparently
- Purpose limitation — data is collected for specified, explicit and legitimate purposes and not processed in a manner incompatible with those purposes
- Data minimisation — only the data that is necessary for the stated purpose is collected and processed
- Accuracy — reasonable steps are taken to ensure personal data is accurate and kept up to date
- Storage limitation — personal data is not kept for longer than is necessary for the purpose for which it was collected
- Integrity and confidentiality — personal data is processed securely and protected against unauthorised access, loss or destruction

5. What Data AFSSA Collects

AFSSA may collect and process the following categories of personal data:

- Client contact details, including names, job titles, email addresses and telephone numbers
- Site addresses and location information
- Pre-assessment information provided by clients, including details of known flooring issues, maintenance records and accident history
- Assessment records, photographs and findings
- Communication records relating to the delivery of AFSSA services
- Assessor details including contact information and professional background

AFSSA does not routinely process special category data. Where any special category data is encountered incidentally during assessment activity, it will be handled with appropriate care and discretion.

6. Lawful Basis for Processing

AFSSA processes personal data on the following lawful bases:

- Contract — processing is necessary for the performance of a contract with the client or to take steps prior to entering into a contract
- Legitimate interests — processing is necessary for the legitimate interests of AFSSA in delivering and improving its assessment services, provided those interests are not overridden by the rights and interests of the data subject
- Legal obligation — processing is necessary for compliance with a legal obligation

7. Data Storage and Security

AFSSA takes appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction or disclosure. This includes:

- Storing personal data securely using password-protected systems and devices

- Limiting access to personal data to those who need it to carry out their role
- Using secure methods for transmitting personal data where required
- Ensuring that assessment photographs, reports and certificates containing personal or location data are stored securely
- Disposing of personal data securely when it is no longer required

8. Data Retention

AFSSA will retain personal data only for as long as is necessary for the purposes for which it was collected. As a general guide:

- Client and assessment records will be retained for a period of six years following the completion of services, in line with standard business and contractual limitation periods
- Marketing and enquiry data will be retained for as long as is reasonably necessary for the purposes of client relationship management, subject to the individual's right to object
- Assessor records will be retained for the duration of the assessor's association with AFSSA and for a reasonable period thereafter

Data will be securely deleted or destroyed when it is no longer required.

9. Individual Rights

Individuals whose personal data is processed by AFSSA have the following rights under UK GDPR:

- The right to be informed about how their data is used
- The right of access to their personal data
- The right to rectification of inaccurate data
- The right to erasure in certain circumstances
- The right to restrict processing in certain circumstances
- The right to data portability in certain circumstances
- The right to object to processing based on legitimate interests

Requests relating to the exercise of these rights should be directed to the data controller. AFSSA will respond to all valid requests within one calendar month.

10. Data Breaches

AFSSA will take reasonable steps to prevent data breaches. In the event of a personal data breach, AFSSA will assess the risk to individuals and, where required, report the breach to the Information Commissioner's Office (ICO) within 72 hours of becoming aware of it. Affected individuals will be notified where required.

11. Third Parties

AFSSA may share personal data with third parties only where necessary for the delivery of its services or where required by law. AFSSA will ensure that any third parties with whom personal data is shared provide adequate guarantees regarding data protection.

AFSSA will not sell personal data to third parties and will not share personal data with third parties for marketing purposes without the explicit consent of the individual.

12. Marketing Communications

Where AFSSA uses contact data for marketing or outreach purposes, it will do so in accordance with UK GDPR and the Privacy and Electronic Communications Regulations. Individuals have the right to opt out of marketing communications at any time.

13. Review

This policy will be reviewed annually or following any significant change in data protection legislation, AFSSA business practices or data processing activity.

14. Related Documents

- Confidentiality Policy
- Code of Conduct
- Quality Assurance Policy
- Document Control Policy

15. Document Control

Policy Owner	Sonny Webb, Founder & Lead Assessor, AFSSA
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