

Data Protection (GDPR) Policy

Secure Living Ltd (trading as USB2U)

1. Policy Statement

Secure Living Ltd, trading as USB2U, is committed to protecting personal data and ensuring it is processed lawfully, fairly, and transparently.

We recognise our responsibilities under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, and we are committed to maintaining high standards of data protection across all areas of our business.

2. Scope

This policy applies to all personal data processed by Secure Living Ltd, including data relating to customers, suppliers, employees, and other business contacts.

It applies to all employees, directors, contractors, and third parties who process personal data on behalf of the company.

3. Data Protection Principles

We comply with the core data protection principles. Personal data will be:

1. Processed lawfully, fairly, and transparently
 2. Collected for specified, legitimate purposes and not used inappropriately
 3. Adequate, relevant, and limited to what is necessary
 4. Accurate and kept up to date where required
 5. Retained only for as long as necessary
 6. Kept secure using appropriate technical and organisational measures
-

4. Lawful Basis for Processing

We only process personal data where there is a valid legal basis, including:

- Contractual necessity (e.g. fulfilling customer orders)
- Legal obligations (e.g. HMRC requirements)
- Legitimate business interests
- Consent (where required, such as marketing communications)

Where consent is used, individuals have the right to withdraw it at any time.

5. Data Collection and Use

We collect and process personal data in order to:

- Manage customer relationships and fulfil orders
- Communicate with customers, suppliers, and partners

- Manage business operations, including accounting and administration
- Comply with legal and regulatory obligations

Personal data is only used for the purposes for which it was collected.

6. Data Minimisation and Accuracy

We ensure that:

- Only necessary personal data is collected and processed
 - Data is reviewed periodically to ensure it remains accurate and relevant
 - Inaccurate or outdated data is corrected or removed where appropriate
-

7. Data Retention

Personal data is retained only for as long as necessary, including:

- Customer and order data retained in line with legal and business requirements
- Financial records retained in accordance with HMRC obligations
- Marketing data retained until consent is withdrawn or no longer relevant

Retention periods are reviewed periodically to ensure compliance.

8. Data Security

We take appropriate measures to protect personal data, including:

- Secure systems and software
- Restricted access to authorised personnel only
- Password protection and access controls
- Regular system updates and maintenance
- Backup and recovery processes

We aim to prevent unauthorised access, loss, or misuse of personal data.

9. Data Sharing

We may share personal data with trusted third parties where necessary to operate our business, including:

- IT and CRM providers
- Payment processors
- Logistics and delivery partners
- Professional advisors (e.g. accountants)

All third parties are expected to handle data securely and in compliance with data protection laws.

10. Data Breaches

In the event of a data breach, we will:

- Assess the risk to individuals
 - Take immediate steps to contain and resolve the issue
 - Notify the Information Commissioner's Office (ICO) where required
 - Inform affected individuals where there is a high risk to their rights
-

11. Individual Rights

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion of data where appropriate
- Restrict or object to processing
- Request transfer of their data

Requests will be handled in line with legal timeframes.

12. Responsibility and Governance

Senior management is responsible for ensuring compliance with this policy.

Day-to-day responsibility for data protection sits with the management team, supported by appropriate systems and processes.

13. Monitoring and Review

This policy will be:

- Reviewed annually
 - Updated in line with legal or operational changes
 - Supported by ongoing awareness within the business
-

14. Approval

This policy is approved by senior management and reviewed annually.

Date: 20/03/2026

Name: Natalie Sharpe, Managing Director

Company: Secure Living Ltd (trading as USB2U)