



Data Protection & UK GDPR Policy

Governance for personal data across marketing, production, employment and client delivery.

Document reference	BC-POL-008
Version	2.0
Status	Approved for publication
Approval date	08 August 2026
Next review	08 August 2027

Legal entity: Becks & Clates Ltd | Company number: 15821561
Registered office: 320 Firecrest Court, Centre Park, Warrington, WA1 1RG
Approved by: Director, Becks & Clates Ltd

Document control

Document title	Data Protection & UK GDPR Policy
Reference	BC-POL-008
Owner	Director responsible for data protection
Approved by	Director, Becks & Clates Ltd
Version	2.0
Effective date	08 August 2026
Review cycle	At least annually and following material legal, operational or organisational change

Document status: public. Printed copies are uncontrolled. The version published by Becks & Clates is the current controlled version.

Contents

1. Purpose and scope
2. Data protection principles
3. Roles and lawful bases
4. Marketing and business development data
5. Photography, video and contributors
6. Security and access
7. Retention and disposal
8. Data subject rights
9. Processors, transfers and DPIAs
10. Breach response and governance
11. Legal references

Purpose and scope

Becks & Clates processes personal data lawfully, fairly, transparently and securely in accordance with the UK GDPR and Data Protection Act 2018.

This policy applies to personal data processed in client work, marketing, websites, CRM/contact activity, contributors and release forms, recruitment, freelancers, suppliers, finance, communications, photos, audio and video.

Data protection principles

- Lawfulness, fairness and transparency.
- Purpose limitation.
- Data minimisation.
- Accuracy.
- Storage limitation.
- Integrity and confidentiality.
- Accountability and evidence of compliance.

Roles and lawful bases

Becks & Clates may act as an independent controller, joint controller or processor depending on the service. The project lead must understand the client instruction and contract before processing sensitive or large-scale personal data.

- Common lawful bases include contract, legitimate interests, legal obligation and consent. Other bases are used where the circumstances require them.
- Consent is not used merely for convenience where another lawful basis is more appropriate.
- Special-category data requires an Article 9 condition in addition to an Article 6 lawful basis.
- Criminal-offence data is processed only with an appropriate legal basis and safeguard.

Marketing and business development data

- Business contact details may be used for proportionate B2B relationship management and outreach where lawful.
- Electronic marketing rules under PECR are considered alongside UK GDPR.
- Opt-outs and objections are respected and suppression records may be retained to prevent unwanted re-contact.
- Purchased or third-party contact data is assessed for lawful sourcing and appropriate use before activation.

Photography, video and contributors

- Production teams should identify whether footage contains personal data and what role Becks & Clates has in processing it.
- Contributor notices, releases or client-led consent processes are used where appropriate to the purpose, rights and intended publication.
- Filming in private or controlled locations follows client/location permissions.
- Extra care is taken for children, vulnerable people, health information, political/religious views or other sensitive content.
- Raw footage is not retained indefinitely merely because storage is available.

Security and access

- Access is limited to people who require information for legitimate work.
- Strong authentication, MFA where available, device security, patching, reputable cloud services and appropriate backups are used.
- Confidential files are not deliberately exposed through public links or insecure transfer methods.
- Lost devices, misdirected emails, compromised accounts and accidental publication are treated as potential personal-data breaches and escalated immediately.

Retention and disposal

Data type	Typical approach
Enquiries / prospects	Retain only while commercially relevant, subject to objections and suppression needs
Client contracts / finance	Retain in line with legal, tax and contractual requirements
Project working files	Retain for delivery, warranty/claims and agreed archive requirements; review when no longer required
Raw footage	Retain only for the agreed/legitimate production and archive period
Recruitment	Retain only for the recruitment purpose and any lawful defence/consent period
Suppression records	Retain minimal data necessary to honour opt-outs

Specific client contracts, litigation holds, statutory duties or project needs may justify a different retention period. The reason should be documented where material.

Data subject rights

Individuals may have rights of access, rectification, erasure, restriction, portability, objection and rights relating to automated decision-making. Requests are verified and managed within applicable statutory timescales. Rights are not absolute and lawful exemptions may apply.

Processors, transfers and DPIAs

- Appropriate written terms are used with processors handling personal data on behalf of Becks & Clates.
- International transfers are made using a lawful UK transfer mechanism where required.
- A data protection impact assessment is considered for new processing likely to create high risk to individuals.
- Client instructions are followed where Becks & Clates acts as processor, unless an instruction is unlawful.

Breach response and governance

- Suspected breaches must be reported immediately to the Director or designated data-protection lead.
- The company records material breaches, assesses risk to individuals and, where legally required, notifies the ICO and affected individuals within applicable timescales.
- Lessons and corrective actions are recorded.
- The policy is reviewed annually and whenever processing or law materially changes.

Legal references

- UK General Data Protection Regulation (UK GDPR).
- Data Protection Act 2018.
- Privacy and Electronic Communications Regulations (PECR), where applicable.