AJAK ENERGY LIMITED

POLICY

Policy: *Data protection policy*

REF: POL25 **ISSUE DATE:** January 2026 **REVISION NO:** V1	**PURPOSE:** Ensure that the staff of AJAK Energy are clear about the purpose and principles of Data Protection and to ensure that it has guidelines and procedures in place which are consistently followed.

Effective Date	January 2026	
Rev No	01	
Created By	C Armitage	
Approved By	C Armitage	
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Revision History

Date	Author	Description of Change
15.01.26	C Armitage	No changes

SUMMARY

AJAK ENERGY LIMITED

POLICY

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Data users must comply with the data protection principles of good practice which underpin the Act. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, Transparent Energy follows the eight Data Protection Principles outlined in the Data Protection Act 1998, which are summarised below:

I. Personal data will be processed fairly and lawfully
II. Data will only be collected and used for specified purposes
III. Data will be adequate, relevant and not excessive
IV. Data will be accurate and up to date
V. Data will not be held any longer than necessary
VI. Data subject's rights will be respected
VII. Data will be kept safe from unauthorised access, accidental loss or damage
VIII. Data will not be transferred to a country outside the European Economic Area

For the purposes of this policy, data collected, stored and used by AJAK Energy falls into 2 broad categories:

1. AJAK Energy internal data records; Staff, volunteers and trustees
2. AJAK Energy external data records; Members, customers, clients.

Internal Records

AJAK Energy obtains personal data (names, addresses, phone numbers, email addresses), application forms and references (and in some cases, other documents) from staff. This data is stored and processed for the following purposes:

- Recruitment
- Equal Opportunities monitoring
- Volunteering opportunities
- To distribute relevant organisational material e.g. meeting papers
- Payroll

Access

The contact details of staff and customers will only made available to other staff or persons with a genuine and proven need to have them. Any other information supplied will be kept in a secure filing cabinet with controlled access. Contact details of staff and customers will not be passed on to anyone outside the organisation without their explicit consent.

A copy of staff emergency contact details will be kept in the Emergency File for Health and Safety purposes to be used in emergency situations e.g. fire/ emergency evacuations. Staff will be supplied with a copy of their personal data held by the organisation if a request is made.

All confidential post must be opened by the addressee only.

Accuracy

AJAK Energy will take reasonable steps to keep personal data up to date and accurate. Personal data will be stored for 6 years after an employee the organisation. Unless the organisation is specifically asked by an individual to destroy their details it will normally keep them on file for future reference.

Storage

Personal data is kept in paper-based systems and on a password-protected computer system. Every effort is made to ensure that paper-based data are stored in organised and secure systems.

Use of Photographs

Where practicable, Transparent Energy will seek consent from individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), the organisation will remove any photograph if a complaint is received.

External Records

Purposes

Transparent Energy obtains personal data (such as names, addresses, and phone numbers) and other information and data from suppliers and customers. This data is obtained, stored and processed solely to assist staff in the efficient running of the business. Personal and other details supplied are only used to send material that is potentially useful.

Consent

Personal and other data will not be passed on to anyone outside the organisation without explicit consent from the data owner, unless there is a legal duty of disclosure under other legislation, in which case the Managing Director discuss the proposed disclosure with other senior managers before allowing consent.

Access

Only the organisation's staff will normally have access to personal and other external data.

All staff trustees are made aware of the Data Protection Policy and their obligation not to disclose personal data to anyone who is not supposed to have it.

Information supplied is kept in a secure filing, paper and electronic system and is only accessed by those individuals involved in the running of the business. Information will not be passed on to anyone outside the organisation without the explicit consent of the owner, excluding statutory bodies e.g. the Inland Revenue. Individuals will be supplied with a copy of any of their data held by the organisation if a request is made. All confidential post must be opened by the addressee only.

Accuracy

AJAK Energy will take reasonable steps to keep personal data up to date and accurate.

Personal data will be stored for as long as the data owner/ customer uses our services and normally longer.

Storage

Personal data may be kept in paper-based systems and on a password-protected computer system. Paper-based data are stored in organised and secure systems.

Responsibilities of staff

During the course of their duties with Transparent Energy, staff will be dealing with information such as names/addresses/phone numbers/e-mail addresses of suppliers and customers and they may be told or overhear sensitive information while working for Transparent Energy. The Data Protection Act (1988) gives specific guidance on how this information should be dealt with. In short, to comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. Staff, paid or unpaid must abide by this policy.

Compliance

Compliance with the Act is the responsibility of all staff, paid or unpaid. Transparent Energy will regard any unlawful breach of any provision of the Act by any staff, paid or unpaid, as a serious matter, which will result in disciplinary action. Any employee who breaches this policy statement will be dealt with under the disciplinary procedure which may result in dismissal for gross misconduct. Any such breach could also lead to criminal prosecution.

Any questions or concerns about the interpretation or operation of this policy statement should, in the first instance, be referred to the line manager.