Data Breach Policy

1. Purpose

This policy defines the procedures implemented by Aerofloor Limited for identifying, reporting, assessing, managing, and responding to personal data breaches in accordance with the UK GDPR, the Data Protection Act 2018, applicable amendments introduced under the Data (Use and Access) Act 2025, and associated data protection obligations.

2. What is a Personal Data Breach?

A personal data breach is a security incident that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

Examples may include:

- Personal data being sent to an unauthorised recipient
- Loss or theft of devices or documents containing personal data
- Unauthorised access to personal information
- Accidental deletion or corruption of personal data
- Personal data becoming unavailable where this may negatively affect individuals

3. Reporting a Suspected Breach

Any actual or suspected personal data breach must be reported immediately to the Office Manager. Where the Office Manager is unavailable, the matter should be reported directly to management.

All employees are responsible for reporting concerns promptly to ensure appropriate action can be taken to contain and assess the breach.

4. Containment & Recovery

Where a breach occurs, Aerofloor Limited will take reasonable steps to:

- Contain the breach
- Recover lost information where possible
- Prevent further unauthorised access or disclosure
- Limit potential harm to affected individuals
- Secure systems, records, or devices involved in the incident

Where personal data has been disclosed to an unauthorised recipient, reasonable steps may be taken to request deletion or destruction of the information and prevent further disclosure.

5. Risk Assessment

Following identification of a breach, Aerofloor Limited will assess the potential risks to affected individuals.

This assessment may consider:

- The type and sensitivity of the personal data involved
- The number of individuals affected
- The potential consequences for affected individuals
- Whether security protections such as passwords or encryption were in place
- The likelihood of harm or misuse of the information

6. ICO & Individual Notification

Where required by applicable legislation, Aerofloor Limited will notify the Information Commissioner's Office (ICO) without undue delay and, where feasible, within 72 hours of becoming aware of a notifiable personal data breach.

Where a breach is likely to result in a high risk to individuals, affected persons may also be informed where appropriate.

7. Documentation & Corrective Action

Aerofloor Limited will document relevant information relating to personal data breaches, including decisions made, actions taken, and corrective measures implemented.

Following a breach, the company will review the incident to identify any improvements required to procedures, training, operational controls, or security measures.