

# THE HOLLYBUSH DATA PROTECTION POLICY

## 1. Introduction

This policy demonstrates full compliance with UK GDPR and the Data Protection Act 2018.

It applies to all personal data processed by The Hollybush.

## 2. Data Processing Activities

Reservations managed via OpenTable.

Loyalty scheme operated through EPOS (The Access Group).

Payments processed via Clover.

Employee and payroll data via Sage Payroll.

Storage via OneDrive, Google Drive, and secure EPOS systems.

CCTV via Hik-Connect (cloud and local storage).

## 3. Lawful Basis

Contractual necessity, legal obligation, legitimate interests, and consent where applicable.

## 4. Data Retention Schedule

Customer data: 6 years

Loyalty data: duration + 6 years

CCTV: 30 days

Employee data: employment + 6 years

Financial data: 6 years

## 5. Security Measures

Role-based access control

Secure passwords

Restricted staff access

Cloud security via trusted providers

## **6. Data Breach Procedure**

Immediate containment and investigation

Risk assessment

ICO notification where required

Communication with affected individuals

## **7. Staff Responsibilities**

All staff must follow GDPR principles and report breaches immediately.

Approved by Owner: James Prangell

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