



CONTROLLED DOCUMENT

Data Protection & Privacy Policy

This policy forms part of the Company's Integrated Management System and establishes the governance arrangements for protection, lawful processing and responsible management of personal information across all Company operations and business activities.

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Document Owner	Business Systems and Innovation Manager
Approved By	Managing Directors
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1. Data Protection & Privacy Policy Statement

Marcon Fit-Out Ltd is committed to protecting the privacy, confidentiality and security of personal information processed across Company operations.

The Company recognises the importance of responsible handling of personal data relating to employees, subcontractors, clients, suppliers and other individuals with whom it interacts.

Marcon Fit-Out Ltd shall seek to:

- Process personal data lawfully, fairly and transparently
- Maintain appropriate technical and organisational security measures
- Protect personal information from unauthorised access, loss or misuse
- Comply with applicable data protection legislation and contractual obligation
- Support responsible information governance practices;
- Promote continual improvement of privacy and data protection arrangements

The Company expects all employees, subcontractors and persons processing personal data on its behalf to comply with this policy and associated Company procedures.

2. SCOPE

This policy applies to:

- All employees
- Subcontractors
- Temporary workers
- Consultants
- Agency personnel
- Suppliers processing personal information on behalf of the Company
- Persons with access to Company personal data

The policy applies to personal information processed:

- Electronically
- Physically
- Within Company systems
- Within project environments
- Through mobile devices
- Through cloud-based platforms
- Across all Company operational locations

3. Data Protection Principles

Marcon Fit-Out Ltd will ensure that personal data is:

- Processed lawfully, fairly and transparently
- Collected and used for legitimate business purposes

- Limited to information necessary for operational requirements
- Maintained accurately where reasonably practicable
- Retained appropriately in accordance with legal and business requirements
- Protected through proportionate technical and organisational security measures.

Access to personal data will be restricted to authorised personnel who require the information to carry out their duties.

Where personal information is shared with third parties, Marcon will ensure that appropriate safeguards are in place to protect that data.

Individuals whose personal data is processed by Marcon have rights under data protection legislation, including the right to request access to their personal information and to request correction where information is inaccurate.

4. Roles and Responsibilities

Directors and senior management are responsible for ensuring appropriate privacy and data protection governance arrangements are implemented across Company operations.

Managers are responsible for:

- Supporting compliance with this policy
- Promoting responsible handling of personal information
- Reporting privacy or data protection concerns
- Supporting implementation of Company data protection controls

The **Business Systems and Innovation Manager** is responsible for supporting data protection governance arrangements, incident management activities and compliance monitoring where applicable.

All employees and persons processing personal information on behalf of the Company are responsible for:

- Handling personal data responsibly
- Maintaining confidentiality where required
- Complying with Company data protection requirements
- Reporting concerns or suspected breaches promptly

Failure to comply with this policy may result in disciplinary, contractual or legal action where appropriate.

Further details regarding how personal information is processed are provided in the Marcon MAR.POL.003 - GDPR Notice for Employees, Workers and Contractors.

Individuals whose personal information is processed by the Company may exercise applicable rights under data protection legislation in accordance with Company procedures and legal requirements.

5. Data Breaches and Incident Reporting

Actual or suspected personal data breaches, loss of personal information, unauthorised disclosure or inappropriate access to personal data must be reported promptly through Company reporting arrangements to the Business Systems and Innovation Manager.

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Incidents shall be reviewed, escalated and managed proportionately in accordance with Company governance and legal obligations where applicable.

6. Third-Party Data Processing

Where personal information is processed by third parties on behalf of the Company, Marcon Fit-Out Ltd shall seek to ensure appropriate contractual, organisational and security controls are established to protect personal data and support compliance with applicable legal obligations.

7. Data Retention

Personal information shall be retained only for as long as necessary to support lawful business activities, contractual obligations and applicable legal requirements.

The Company shall seek to maintain appropriate retention and disposal arrangements for personal information where applicable.

8. Training and Awareness

The Company shall provide appropriate information, instruction and awareness relating to data protection, confidentiality and responsible information handling to relevant personnel.

9. Monitoring, Review and Assurance

The Company shall periodically monitor implementation of this policy through:

- Internal reviews
- Data protection compliance checks
- Incident trend analysis
- Management review activities
- Governance and compliance assessments

This policy shall be reviewed periodically or following:

- Legislative change
- Audit findings
- Data protection incidents
- Operational change
- Lessons learned

A handwritten signature in black ink, appearing to read 'Mark O'Connor'.

Mark O'Connor

Managing Director

Date: 10.05.2026

A handwritten signature in black ink, appearing to read 'Mark McElroy'.

Mark McElroy

Managing Director