

Data Protection Policy



Starfish 9 Ltd. Data Protection Policy - 2026 - Issue 5

(Last Review 31st Jan 2026 - Next Planned Review 31st Jan 2027)

Data Protection

What this policy covers

Starfish 9 Ltd require the collection of data from its staff, clients, sub-contractors and suppliers which may also include personal details. This ensures that we hold the correct and current information as required by our operational needs.

All data is held securely by Starfish 9 Ltd. Data will be treated confidentially and will not be disclosed to external organisations, other than those on related projects or for other legitimate reasons.

Starfish 9 Ltd take our responsibility for looking after information seriously. We comply with GDPR & Data Protection Act 2018 at all times when asking for or handling your information including:

- Personal data shall be processed fairly and lawfully
- Data is processed only for the purpose(s) for which it was collected
- Data is adequate, relevant and not excessive
- Data is accurate and kept up to date
- Data is not kept longer than necessary
- Data is kept secure against unauthorised access and loss or damage
- Processing personal data only in order to meet our operational needs or fulfil legal requirements
- Providing adequate training for all staff responsible for personal data
- Ensuring that queries about data protection, internal and external to other organisation, is dealt with effectively and promptly
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
- Regularly reviewing data protection procedures and guidelines within the organisation

All members of staff are to be made fully aware of this policy and of their duties and responsibilities under the Act. All clients or other contractors who are users of personal information supplied by us will be required to confirm that they will abide by the requirements set out by GDPR & The Data Protection Act 2018.

Name: John Jessimer

Signed: 

Position: Managing Director

Date: 31 January 2026

