

Thames Hightech Ltd

Data Protection Policy 2025/26

*Registered address: Hurlingham Studio, Ranelagh Gardens, London SW6 3PA
ICO registration: ZB337648 | Responsible lead: Yuhong Li | Contact:
Andrew.li@thameshightech.com*

This policy explains how Thames Hightech Ltd handles personal data in line with UK data protection law, including the UK GDPR and the Data Protection Act 2018.

For the purposes of this policy, Thames Hightech Ltd acts as a data controller in relation to personal data it holds and uses for its business and guardianship-related activities.

This policy should be read alongside the organisation's Privacy Notice and other relevant safeguarding, recruitment, record-keeping and confidentiality procedures.

1. Scope

This policy applies to personal data processed by Thames Hightech Ltd relating to staff, contractors, volunteers, students, parents, homestays, referees, partner schools and other individuals connected with the organisation.

2. Key definitions

- Personal data: information relating to an identified or identifiable living person.
- Special category data: personal data that is more sensitive, such as health data, racial or ethnic origin, religious beliefs, biometric data, sex life or sexual orientation.
- Processing: any operation carried out on personal data, including collection, storage, use, disclosure or deletion.
- Data subject: the individual the personal data relates to.
- Processor: a person or organisation processing personal data on behalf of the controller.

3. Roles and responsibilities

Thames Hightech Ltd is responsible for ensuring compliance with data protection law. Yuhong Li has day-to-day responsibility for overseeing data protection practice within the organisation. All staff and other persons handling personal data on behalf of Thames Hightech Ltd are expected to follow this policy.

4. Data protection principles

Thames Hightech Ltd processes personal data in accordance with the key UK GDPR principles. Personal data must be:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- kept no longer than necessary;
- processed securely and protected against unauthorised or unlawful access, loss, destruction or damage;
- handled in a way that allows the organisation to demonstrate accountability.

5. Lawful bases

Thames Hightech Ltd will identify a lawful basis before processing personal data. Depending on the circumstances, this may include consent, contract, legal obligation, vital interests or legitimate interests. Where special category data is processed, an additional lawful condition will also be identified where required.

6. Transparency and privacy information

Individuals should be given appropriate privacy information explaining how their data will be used. Thames Hightech Ltd provides this information through its Privacy Notice and other communications where appropriate.

7. Data minimisation and accuracy

- Only personal data that is relevant and necessary will be collected and used.
- Reasonable steps will be taken to ensure personal data is accurate and kept up to date.
- Inaccurate data will be corrected or deleted as appropriate.

8. Retention and deletion

Thames Hightech Ltd will not keep personal data for longer than necessary. Retention decisions will take account of legal, regulatory, safeguarding and business needs. When data is no longer required, it will be securely deleted or destroyed.

9. Security of personal data

Thames Hightech Ltd takes data security seriously and uses appropriate technical and organisational measures to protect personal data.

- Access to personal data is restricted to those who need it.
- Electronic records should be protected by passwords and suitable access controls.
- Paper records containing personal data should be stored securely.
- Portable devices and files containing sensitive personal data should be handled carefully and protected appropriately.
- Confidential data must not be shared with unauthorised persons.

10. Personal data breaches

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

- Any actual or suspected personal data breach must be reported without delay to Yuhong Li.
- Breaches will be assessed promptly and recorded.
- Where required, Thames Hightech Ltd will notify the ICO and/or affected individuals.
- Action will be taken to contain the breach and reduce the risk of recurrence.

11. Data subject rights

Individuals may have rights under data protection law, including rights of access, rectification, erasure, restriction, objection and, in some cases, data portability.

- Requests should be handled promptly and within legal time limits.

- Identity may need to be verified before a request is answered.
- Some rights are subject to exemptions or limitations depending on the circumstances.

12. Data protection by design and default

Data protection should be considered whenever Thames Hightech Ltd introduces a new process, system, service or way of working. The organisation aims to process only the minimum personal data necessary for the task in question.

13. Data processors and sharing

Where Thames Hightech Ltd uses third parties to process personal data on its behalf, appropriate checks and contractual protections should be in place. Personal data will only be shared externally where there is a lawful basis and where sharing is necessary, proportionate and secure.

As part of AEGIS accreditation or re-accreditation processes, Thames Hightech Ltd may be required to share limited contact and operational information relating to parents, homestays, schools and students where this is necessary for accreditation purposes.

14. Record of processing and DPIAs

Thames Hightech Ltd maintains an appropriate record of processing activities. Where a new or changed activity is likely to create a high risk to individuals, the organisation will consider whether a Data Protection Impact Assessment is required.

15. Training and awareness

Appropriate data protection awareness should be provided to relevant staff and others handling personal data on behalf of the organisation.

16. Data Protection Officer

At present, Thames Hightech Ltd does not consider itself legally required to appoint a Data Protection Officer. This position will be kept under review if the nature, scale or regularity of processing changes.

17. Review

This policy will be reviewed at least annually and sooner if guidance, legislation, ICO expectations, AEGIS standards or organisational practice changes.

Version	2025/26
Approved by	Yuhong Li
Effective date	1 September 2025
Review date	1 September 2026
ICO registration	ZB337648