



Data Processing Agreement

Revision Management

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D Fitzsimmons - COO

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1. Vision and Purpose

HexPlanIT is committed to protecting the privacy and security of personal data processed in the course of delivering its services and managing its business operations. The purpose of this policy is to define a consistent framework for lawful, fair, and transparent processing of personal data, ensuring compliance with applicable data protection laws and supporting client trust in HexPlanIT's solutions and practices.

2. Scope and Definitions

This policy applies to all HexPlanIT employees, contractors, and third parties who process personal data on behalf of HexPlanIT, and covers all processing activities in all locations and systems used by the company. Key terms such as personal data, special category data, processing, controller, processor, and data subject have the meanings given in relevant data protection legislation (including UK/EU GDPR and equivalent regimes).

3. Data Protection Principles

HexPlanIT will adhere to the following principles whenever it processes personal data:

- Lawfulness, fairness and transparency – Data will be processed on a valid legal basis, in a way that is fair to individuals and clearly communicated through appropriate notices.
- Purpose limitation – Data will be collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes.
- Data minimisation – Only the data necessary for defined purposes will be collected and retained.
- Accuracy – Reasonable steps will be taken to keep personal data accurate and up to date, with mechanisms for correction where needed.
- Storage limitation – Data will not be kept longer than necessary and will be securely destroyed or anonymised when no longer required.
- Integrity and confidentiality – Appropriate technical and organisational measures will protect data against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

4. Roles and Responsibilities

HexPlanIT's senior management is responsible for ensuring adequate resources and support for effective data protection. A designated Data Protection Officer or equivalent function will oversee compliance, provide guidance, and act as the primary contact for

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supervisory authorities and data subjects, while all staff remain individually responsible for handling personal data in line with this policy and related procedures.

5. Legal Bases and Purpose Specification

Personal data processed by HexPlanIT will be grounded in appropriate legal bases such as performance of a contract, compliance with legal obligations, legitimate interests (balanced with data subject rights), or consent where required. Processing purposes will be documented in records of processing activities, and aligned to HexPlanIT's business functions, including provision of software and consulting services, client relationship management, HR and recruitment, security, and regulatory compliance.

6. Data Subject Rights

HexPlanIT will maintain procedures to support data subjects in exercising their rights, including access, rectification, erasure, restriction, portability, and objection, as well as rights related to automated decision-making where applicable. Requests will be handled promptly within statutory timeframes, verified to prevent unauthorised disclosure, and logged for audit purposes, with escalation to the DPO where necessary.

7. Data Security and Access Control

HexPlanIT will implement layered technical and organisational security measures appropriate to the sensitivity and risk profile of data processed, including role-based access controls, encryption, secure development practices, logging and monitoring, backup and recovery, and regular security testing. Access to personal data will be limited to individuals with a legitimate business need, and user access rights will be reviewed periodically and revoked when no longer required.

8. Data Sharing, Transfers and Third Parties

Where HexPlanIT engages third-party service providers or sub-processors, data processing agreements will be in place requiring equivalent data protection and security standards. International transfers of personal data outside the UK/EEA or other regions with adequate protection will only occur where appropriate safeguards (such as Standard Contractual Clauses or UK IDTA/Addendum) are implemented and documented.

9. Data Breach Management

HexPlanIT will maintain an incident response and breach management procedure that defines how suspected or actual personal data breaches are identified, contained, investigated, and reported. Where required by law, affected clients, data subjects, and supervisory authorities will be notified without undue delay, and lessons learned will be incorporated into improved controls and training.

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10. Training, Awareness and Compliance Monitoring

All relevant staff will receive regular training on data protection obligations, secure data handling, and incident reporting, with additional role-specific guidance for high-risk functions (e.g. engineering, support, HR). Compliance with this policy will be monitored through periodic reviews, audits, and control testing, and non-compliance may result in disciplinary action or contractual remedies, as appropriate.

11. Policy Governance and Review

This policy is approved by HexPlanIT's senior leadership and will be reviewed at least annually, or more frequently in response to significant legal, regulatory, organisational, or technological changes. Updates will be communicated to all relevant stakeholders, and supporting procedures and documentation (such as the DPA, security standards, and ROPA) will be aligned accordingly.

CEO Barry Whitfield

COO Daniel Fitzsimmons

C_O Chris



December 12th 2025

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