



Data Protection Policy

Pronounced80 Solutions Limited

Freeing business from the tyranny of legacy software

Version 1.0 | Effective: May 2026 | Review: Annual

Owner: Director (acting as Data Protection Lead)



1. Purpose

To ensure personal data is processed lawfully, fairly and securely in line with UK GDPR and the Data Protection Act 2018.

2. Scope

All personal data processed by Pronounced80 Solutions Limited, whether as controller (e.g. enquiries, employees, suppliers) or processor (client data).

3. Principles (UK GDPR Art. 5)

1. Lawfulness, fairness and transparency.
2. Purpose limitation.
3. Data minimisation.
4. Accuracy.
5. Storage limitation.
6. Integrity and confidentiality (security).
7. Accountability.

4. Roles

- **Data Protection Lead:** Director. Contact: info@pronounced80.com
- ICO registration is maintained and renewed annually.

5. Lawful Bases

We identify and document a lawful basis before processing (typically contract, legitimate interests, legal obligation, or consent).

6. Records of Processing (RoPA)

A Record of Processing Activities is maintained covering purposes, categories of data, recipients, retention, and safeguards.

7. Data Subject Rights

Requests are acknowledged promptly and fulfilled within one month (extendable where permitted). Verification of identity is performed before disclosure.

8. Privacy by Design and Default

Privacy considerations are built into project, system and supplier decisions.



9. Processors and Sub-Processors

We engage processors only where they provide sufficient guarantees and are bound by written contract including UK GDPR Article 28 terms.

10. International Transfers

Transfers outside the UK are made only with appropriate safeguards (UK adequacy, IDTA / SCCs + UK Addendum).

11. Personal Data Breach

- Detected, contained and recorded.
- Risk-assessed; the ICO is notified within 72 hours where required.
- Affected individuals and clients notified without undue delay where required by law or contract.

12. Training

All personnel complete data protection awareness at onboarding and at least annually thereafter.

13. Review

Reviewed annually or upon legal/regulatory change.