
COMPANY POLICY

Data Protection & GDPR Policy

Policy owner	Kevin Buchler, Founder & Managing Director, CoolPath Ltd
Applies to	CoolPath Connect, the Certified F-Gas Technician Registry, and all candidate, technician and finance-referral data
Effective date	August 2026
Next review	August 2027, or sooner following a material change in law, scale or activity

1. Purpose and Scope

CoolPath Connect holds personal data on candidates and technicians, including qualification records, DBS status and contact details, and CoolPath refers end-users to asset finance providers for equipment finance (see Draft Agreements & MOUs, Document E). This makes CoolPath a data controller and, in places, a processor under UK GDPR and the Data Protection Act 2018, with heightened sensitivity around DBS data (special category / criminal offence data) and financial referral data.

2. Policy Statement

CoolPath is committed to lawful, fair and transparent processing, to data minimisation, and to purpose limitation. The Certified F-Gas Technician Registry is designed to hold only the data necessary to verify and display a technician's accreditation status.

3. Key Provisions

- A lawful basis is mapped for each data category: recruitment data under contract, DBS data under legal obligation, finance-referral data under consent.
- A data retention schedule applies: Registry records are kept while a listing is active, plus a defined period after exit; unsuccessful applications are deleted after a set period.
- A documented process exists for data subject rights requests, including access, rectification and erasure.
- A breach notification procedure is in place, reflecting the 72-hour notification duty to the Information Commissioner's Office.
- Every third party that receives CoolPath data, including network partners, colleges and finance providers, is bound by a data-sharing agreement requiring an equivalent standard of protection.
- CoolPath Connect is protected by access controls, encryption in transit and at rest, and regular backups, consistent with the Business Continuity Plan.

4. Roles and Responsibilities

The Founder & Managing Director acts as lead contact for data protection matters, with a formal Data Protection Officer appointment to be made as CoolPath's scale and data volumes grow. This policy is reviewed annually, or sooner following a material change in UK data protection law.

Approved and signed on behalf of CoolPath Ltd:



Kevin Buchler

Founder & Managing Director, CoolPath Ltd

Date: August 2026
