

DATA PROTECTION & IS POLICY

APRIL 2026



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1. Purpose

Rehiko

Rehiko Uninterruptible Power Ltd. Woodgate, Bartley Wood Business Park, Hook, Hampshire, RG27 9XA

Registered in England No. 3150129

Tel: +44 (0) 1256 386700 **Website:** www.ups.rehiko.co.uk

Rehiko is the new name for Kohler Uninterruptible Power

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Uninterruptible Power Limited trading as Rehlko Uninterruptible Power ("RUP", "we", "us", "our") is committed to protecting personal data and information assets in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant information security standards.

This Policy:

- Sets out our **programme to comply with data protection law**.
- Defines **responsibilities for handling personal and other sensitive information**.
- Describes the **technical and organisational measures** we use to protect information, including IT data security, firewalls and cyber controls.
- Confirms our approach to **data protection and information security training** for staff.
- Provides a **privacy statement** explaining how we handle personal data relating to customers, suppliers and other business contacts.

This Policy is intended to be provided to clients, suppliers, auditors and other interested parties as evidence that RUP treats data protection and information security as core business priorities.

2. Scope and relationship to Group policies

This Policy applies to:

- All activities carried out by Rehlko Uninterruptible Power in the United Kingdom.
- All employees, temporary staff, contractors and others who handle information on behalf of RUP.
- All information we create, receive, store, or process in the course of selling, installing, commissioning and supporting uninterruptible power systems and related services.

RUP is part of Discovery Energy LLC trading as Rehlko. We operate within, and in addition to, the following group-level frameworks and policies, including but not limited to:

- Rehlko Information Security Policy, including organisational, people, physical and technological controls.
- Rehlko Technological Controls Policy (access control, endpoint security, networks, encryption, backups etc.).
- Rehlko Data Backup and Recovery Policy.
- Rehlko AI Policy, IT Use and Security Policy, and Social Media Policy.

This Policy localises and supplements those group policies for RUP's specific operations, systems and data.

3. Definitions

For the purposes of this Policy:

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Rehlko Uninterruptible Power Ltd. Woodgate, Bartley Wood Business Park, Hook, Hampshire, RG27 9XA
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- **Personal data** - any information relating to an identified or identifiable individual (e.g. name, business email, business phone number, job title).
- **Special category data** - personal data requiring extra protection (e.g. health data)
 - not routinely processed by RUP in its customer-facing operations.
- **Processing** - any operation performed on personal data (collection, storage, use, sharing, deletion, etc.).
- **Information assets** - all information and supporting systems used by RUP, whether electronic or paper-based.

4. Our GDPR compliance programme

RUP maintains a structured programme to comply with UK GDPR and related privacy legislation. Key elements include:

4.1 Governance and roles

- Overall accountability for data protection and information security rests with the

RUP Management Team.

- A **Data Protection Lead** (held by the role of Senior Technical Systems and Supplier Manager) is appointed within RUP to coordinate compliance, maintain records, advise on risks and act as primary contact for data protection matters.
- A **Group Data Privacy / Legal function** (under Rehlko) provides overarching guidance and support.
- Line managers ensure that their teams follow this Policy and complete all required training.
- All staff are individually responsible for protecting the information they handle and for reporting any concerns or incidents immediately.

4.2 Records of processing and risk assessment

- RUP maintains a **Record of Processing Activities (ROPA)** describing what personal data we process, for what purposes, where it is stored, and who it is shared with (where relevant).
- We assess privacy and information security risks for relevant projects and systems, using **risk-based** principles aligned with Rehlko's ISMS (Information Security Management System).
- Where appropriate, **Data Protection Impact Assessments (DPIAs)** are carried out before introducing new systems or processing activities that may pose higher risk to individuals.

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4.3 Data protection by design and by default

- New systems, services and processes that involve personal data must consider privacy and security **from the outset**, not as an afterthought.
- By default, we only collect and process the **minimum personal data necessary** for a specific, legitimate business purpose.

Access to personal data is based on **need-to-know** and **least privilege** principles

5. Types of personal data we process and purposes (Privacy Statement)

RUP provides uninterruptible power supply (UPS) products and related services on a primarily **business-to-business (B2B)** basis. We **do not** routinely process customer end-user or consumer data on behalf of clients.

5.1 Categories of personal data

We mainly process:

- **Customer and prospect contacts:**
 - Names, business email addresses, business phone numbers, job titles, employing organisation, correspondence records.
- **Supplier and partner contacts:**
 - Names, business contact details and correspondence.
- **Service, project and site contacts:**
 - Names and business contact details of individuals involved in site surveys, installations, maintenance and support.
- **Employee and applicant data:**
 - Handled in line with separate HR and recruitment policies and not covered in full detail in this document.

We **do not systematically collect special category personal data or children's data** in the course of our normal customer operations. If this is unavoidable for a specific purpose (e.g. health and safety incident reporting), it will be subject to additional safeguards.

5.2 Lawful bases for processing

We process personal data only where a lawful basis under UK GDPR applies, typically:

- **Contract** - to perform a contract with a customer, supplier or individual, or to take steps prior to entering into a contract.
- **Legitimate interests** - for day-to-day business administration, relationship management, and the planning and delivery of UPS systems and services, where our interests are not overridden by the rights and freedoms of individuals.

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- **Legal obligation** - to comply with legal and regulatory requirements (e.g. tax records, health and safety, financial reporting).
- **Consent** - for certain optional communications or where required by law; individuals can withdraw consent at any time.
-

We do not sell personal data to third parties.

6. Data retention and deletion

RUP keeps personal data **only for as long as necessary** to fulfil the purposes for which it was collected and to meet legal, regulatory and contractual requirements.

- Retention periods are governed by:
 - o Group and local **records management/ data management policies**;
 - o Any contractual requirements with clients or suppliers (including any retention/ deletion annexes where applicable);
 - o Statutory limitation periods for potential claims.
- When data is no longer required, it is **securely deleted or anonymised**, in line with our data lifecycle and records management procedures (including secure disposal of paper records and secure deletion of electronic files).

Details of typical retention periods for key record types are maintained within the RUP IMS and can be provided on request.

7. Information security and cyber security measures

RUP's information security controls are built on the Rehlko Information Security Policy and Technology Controls, which are aligned with **ISO/IEC 27001 and ISO/IEC 27002**. We apply **defence-in-depth** principles using a combination of organisational, technical and physical controls.

7.1 Systems and infrastructure

- Day-to-day business information is held primarily within the **corporate Microsoft 365 (M365) environment**, including Outlook, SharePoint, OneDrive and Teams.
 - o Access to M365 is centrally managed by corporate IT, including:
 - o Unique user IDs and **strong authentication** (e.g. multi-factor authentication).
 - o Role-based access to SharePoint sites and shared folders.
- Central policies for device compliance and conditional access.

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- Certain operational functions are delivered via a **corporate environment** and other central systems managed by Rehlko IT, with resilience and backup appropriate to business needs.
- RUP maintains a secure **server/ comms room** that supports local networking and communications. This is physically secured and supported by its own UPS and backup arrangements.

7.2 Technical security controls

Corporate IT and Rehlko Technology Controls provide, as a minimum:

- **Firewalls and network security** to manage and monitor external connectivity and restrict unauthorised access.
- **Endpoint security** on laptops and other devices, including antivirus/anti-malware, operating system and application patching, and remote-wipe capability where appropriate.
- **Access and identity management:** strong passwords, multi-factor authentication, principle of least privilege, and timely removal of access for leavers.
- **Encryption** of data in transit and at rest where appropriate (e.g. within M365, VPN connections, and encrypted storage on corporate devices).
- **Backup and recovery** in line with the Rehlko Data Backup and Recovery Policy, including regular backups, secure storage, recovery testing and defined RTO/RPO targets for critical systems.
- **Monitoring and logging** of security-relevant events, with processes to investigate suspicious activity and respond to threats.

7.3 Physical security

- RUP's offices are accessed via **card-controlled entry** during defined office hours.
- Visitors are required to **sign in**, wear visitor identification where applicable and be escorted in restricted areas.
- The local server/ comms room is **locked** and access is restricted to authorised staff only.
- Paper records containing sensitive or personal data are stored in **locked cabinets** or restricted areas and are disposed of via secure shredding or approved confidential waste services.

7.4 Acceptable use and remote working

- Staff must comply with the Rehlko IT **Use and Security Policy**, **Social Media Policy**, and **AI Policy** when using corporate systems, electronic communications, AI tools and social platforms for work purposes.
- Remote access to corporate systems (including M365 and other applications) is provided through **secure VPN** environments, using company-approved devices and security configurations only.
- Personal devices used for work (where permitted) must comply with corporate security standards (e.g. device encryption, passcode, up-to-date security patches).

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8. Responsibilities for handling sensitive information

Everyone at RUP has a role in protecting data and information assets.

8.1 Directors and Management Team

- Provide visible leadership and resources for data protection and information security.
- Approve this Policy and ensure it is **reviewed at least annually**.
- Ensure that RUP's risk assessments, controls and training remain appropriate for the business.

8.2 Data Protection Lead

- Maintains this Policy and associated procedures.
- Coordinates responses to data subject requests and data protection queries.
- Keeps the Record of Processing Activities up to date.
- Escalates risks and issues to the Management Team and, where necessary, to Group Data Privacy/ Legal.

8.3 Line managers

- Ensure their teams understand and follow this Policy and any local procedures.
- Ensure staff complete mandatory training and refresher modules on time.
- Make sure that access rights are appropriate, and that leaver and mover processes are triggered promptly.

8.4 All staff, contractors and temporary workers

All individuals handling information on behalf of RUP must:

- Only access information that they are authorised and legitimately need for their role.
- Handle personal and sensitive information in line with this Policy and any related procedures.
- Use strong passwords, keep devices secure, and lock screens when away from desks.
- Report any actual or suspected data breach, phishing attempt, loss of device or other security incident immediately, following local reporting routes.
- Participate fully in training and awareness activities and ask if they are unsure about how to handle information safely.

Failure to adhere to this Policy may result in disciplinary action, up to and including termination of employment or contract, in line with Rehlko and RUP HR procedures.

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9. Data protection training and awareness

- All RUP employees must complete **mandatory online training** covering:
 - Cyber security awareness.
 - GDPR and data protection basics.
 - Information security and acceptable use of IT.
- New starters complete these modules as part of induction and **before** being granted access to key systems.
- Refresher training is required regularly (at least annually) and when policies or systems materially change.
- Additional, role-specific training is provided to staff who handle higher-risk data (e.g. customer relationship owners, system administrators, HR).

Completion and effectiveness of training are monitored, and non-completion is followed up by managers.

10. Data subject rights

Under UK GDPR, individuals have rights in relation to their personal data, including the right to:

- Be informed about how their data is used.
- Access their personal data.
- Rectify inaccurate or incomplete data.
- Erase data in certain circumstances ("right to be forgotten").
- Restrict or object to certain types of processing.
- Data portability (where applicable).
- Not to be subject to decisions based solely on automated processing, including profiling, that have legal or similarly significant effects.

RUP will:

- Respond to valid requests within **one month**, or explain where an extension is needed, in line with legal requirements.
- Verify the identity of the requester before disclosing personal data.
- Keep a record of all requests received and responses issued.

Individuals can exercise their rights by contacting RUP using the details in section 13.

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11. Data sharing and international transfers

RUP may share personal data with:

- Other Rehlko group entities involved in delivering services.
- Service providers who support our business (e.g. IT support, logistics, communications providers), under appropriate **data processing agreements**.
- Professional advisers (e.g. auditors, legal counsel).
- Public authorities or regulators where required by law.

Personal data is not sold to third parties.

Where data is transferred outside the UK, RUP and/or the wider group will ensure that appropriate **safeguards** are in place (such as adequacy decisions, standard contractual clauses or other recognised mechanisms), in accordance with applicable law and group privacy policies.

12. Data breaches and incident management

A **personal data breach** is any incident that leads to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

RUP will:

- Maintain and follow an **incident response process** aligned with Rehlko's Information Security Policy, including escalation paths to Group Security and Data Privacy teams.
- Record all suspected and confirmed incidents and investigate root causes.
- Take prompt steps to contain and mitigate impact, including technical, organisational and communication measures.
- Notify the **Information Commissioner's Office (ICO)** and affected individuals where required by law, in coordination with group Data Privacy/ Legal.
- Conduct **lessons-learned reviews** after incidents and integrate improvements into procedures and training.

All staff must report **immediately** any suspected data breach or cyber incident through the defined internal channels.

13. How to contact us about privacy

For questions about this Policy or to exercise data subject rights, individuals can contact:

Data Protection Lead (Senior Technical Systems and Supplier Manager) Uninterruptible Power Limited

Woodgate, Bartley Wood Business Park Hook

Hampshire RG27 9XA

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Tel: 01256 386700

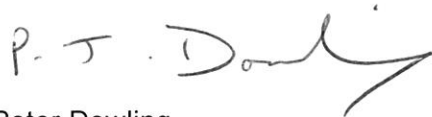
Where appropriate, matters may also be referred to the **Rehiko Data Privacy Center of Excellence** in line with the Global Privacy Policy.

Individuals also have the right to raise concerns with the **Information Commissioner's Office (ICO)**, but we encourage them to contact RUP first so that we can seek to resolve any issues.

14. Monitoring, audit and review

- Compliance with this Policy may be monitored through **internal audits, spot checks and system monitoring**, in line with group policies.
- This Policy is reviewed **at least annually** and sooner if there are significant changes in legislation, regulation, corporate systems or RUP's operations.
- The **Management Team** is responsible for ensuring that updates are communicated and that any necessary changes to procedures and training are implemented.

The Managing Director has overall responsibility for ensuring that this policy is complied with. It will be reviewed at least once a year and at such other times as required, to ensure it remains appropriate to the requirements and objectives of our business.



Peter Dowling

Managing Director

April 2026

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