

# **GDPR Compliance Statement**

## **Centralix Solutions GDPR Compliance Statement**

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### **About GDPR**

The Europe General Data Protection Regulation (“GDPR”) comes into action for the EU on 25th May 2018 and ensures with it the most commendable changes to data protection law in the last two decades. On the basis of privacy by design and taking a risk-based approach, the GDPR is designed to fulfil the requirements of the new digital era.

### **Our Commitment**

Centralix Solutions. (‘we’ or ‘us’ or ‘our’) are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always done our utmost to have a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognize our obligations in updating and expanding this program to meet the demands of the GDPR and the Privacy and Electronic Communications Regulations (PECR).

Centralix Solutions is dedicated to safeguarding the personal information under our remit and to developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been summarized in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

### **How We are Preparing for the GDPR**

Centralix Solutions already has a consistent level of data protection and security across our organization. Our preparation includes: –

- Information Audit – carrying out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed, where it is stored, and if and to whom it is disclosed.
- Policies & Procedures – implementing new data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including:
  - *Data Protection* – our main policy and procedure document for data protection has been overhauled to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals.
  - *Data Retention & Erasure* – we are in the process of updating our retention policy and schedule to ensure that we meet the ‘data minimization’ and ‘storage limitation’ principles and that personal information is stored, archived and destroyed compliantly and ethically. We are actively working towards putting dedicated erasure procedures in place to meet the new ‘Right to Erasure’ obligation and are aware of when this and other data subject’s rights apply; along with any exemptions, response timeframes and notification responsibilities.
  - *Data Breaches* – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach within 72 hours of becoming aware of the breach. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.
- International Data Transfers & Third-Party Disclosures – where Data Bridge Market Research or transfers personal information outside the EU, we are actively working towards having procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures will include a continual review of the countries with sufficient adequacy decisions, as well as provisions for binding corporate rules; standard data protection clauses or approved codes of conduct for those countries without. We will be carrying out strict due diligence checks with all recipients of personal

data to assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.

- Data Subject Access Request (DSAR) – we are actively revising our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge. Our new procedures will detail how to verify the data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.
- Legal Basis for Processing – we are reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
- Privacy Notice/Policy – we are revising our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- Obtaining Consent – we have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.
- Direct Marketing – we have revised the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.

- Data Protection Impact Assessments (DPIA) – where we process personal information that is considered high risk, involves large scale processing or includes special category/criminal conviction data; we have developed stringent procedures and assessment templates for carrying out impact assessments that comply fully with the GDPR's Article 35 requirements. We have implemented documentation processes that record each assessment, allow us to rate the risk posed by the processing activity and implement mitigating measures to reduce the risk posed to the data subject(s).
  
- Processor Agreements – where we use any third-party to process personal information on our behalf, we are in the process of drafting compliant Processor Agreements and due diligence procedures for ensuring that they (as well as we), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the service provided the necessity of the processing activity, the technical and organisational measures in place and compliance with the GDPR.
  
- Special Categories Data – where we obtain and process any special category information, we do so in complete compliance with the Article 9 requirements and have high-level encryptions and protections on all such data. Special category data is only processed where necessary and is only processed where we have first identified the appropriate Article 9(2) basis or the Data Protection Bill Schedule 1 condition. Where we rely on consent for processing, this is explicit and is verified by a signature, with the right to modify or remove consent being clearly signposted.

### **Data Subject Rights**

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy to access information upon request and via our Privacy Policy of an individual's right to access any personal information that Centralix Solutions processes about them and to request information about: –

- What personal data we hold about them
- The purposes of the processing
- The recipients to whom the personal data has/will be disclosed

- How long we intend to store your personal data for
- If we did not collect the data directly from them, wherever possible, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

### **Information Security & Technical and Organizational Measures**

Centralix Solutions takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures, including:

- Cyber Essential accreditation.
- Latest generation firewalls with latest patches at each location.
- Secure VPNs between regional & global locations.
- MPLS network connecting the major European offices.
- Strict access management controls to all areas on the file servers.
- Market leading threat detection with the latest patches on all servers & workstations.
- Workstation & removable media encryption.
- Market leading appliance web security & control protection.
- Mobile device management on all company owned hand-held devices.
- Regular vulnerability and penetration testing.
- Clustered mail servers on separate sites for DR purposes.
- Full network fail-over resilience.
- IT infrastructure located in air-conditioned rooms behind security locked doors.

- GFS backup rotation system with media stored either in fire proof safes or off-site.
- \* Secure data destruction once IT equipment reaches end of life.

### **GDPR Roles and Employees**

Centralix Solutions have appointed a data privacy personnel to develop and implement our roadmap for complying with the new data protection Regulation. The personnel is responsible for promoting awareness of the GDPR across the organization, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures.

Centralix Solutions Ltd understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans. We have implemented an employee training program specific to our core business functions which has been provided to all employees prior to May 25th, 2018, and forms part of our induction and annual training program.