

Greenwell Gleeson Limited Data Protection Statement

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Greenwell Gleeson Limited

Data Protection Statement

1 General Data Protection Regulations

A new EU regulation has come into effect that impacts how all organisations collect, hold and process people's personal data. In the UK, the applied General Data Protection Regulation (GDPR) is a significant piece of European legislation as is the Data Protection Act 2018 which both came into force on 25th May 2018. They build on existing data protection laws, strengthening the rights that individuals have over their personal data.

2 Taking data security seriously

Greenwell Gleeson Ltd has always taken data security and privacy extremely seriously and believes that the change in regulation is an important step forward for clarifying and enabling individual privacy rights. We are committed to meeting our obligations and our aim has always been to provide you with the highest level of data security and privacy, constantly reviewing and reinforcing our practices. In support of our approach to data protection and the importance it plays, we have appointed a Data Protection Officer.

3 Proving Compliance

As with any compliance, it is easy to state, but very much harder to prove that you adhere to it. To demonstrate that Greenwell Gleeson Ltd is committed to meeting our obligations now and into the future, we have engaged a data protection specialist on a permanent basis to underpin and reinforce any stated compliance.

4 Compliance Responsibilities

We have evaluated the changes in the law along with new obligations and restrictions. As a result, we have approached it from three different angles.

1. Ensuring our own compliance as a company that holds and processes people's personal data.
2. Ensuring our partners and suppliers adhere to the highest standards of compliance, and
3. Ensuring that our actions support our customers with their rights.

5 Greenwell Gleeson Ltd Compliance

Greenwell Gleeson Ltd have undergone a full review of all internal security and privacy policies to ensure that all personal data within, or passing through the company, will be handled in accordance with the law.

We will implement the relevant tools and practises to ensure the safeguarding of any data handled by Greenwell Gleeson Ltd and all of its employees.

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All employees will be provided with training relevant to their role.

New data protection laws place a greater emphasis on the documentation that data controllers must keep, demonstrating their accountability. We have examined and adjusted our internal record keeping to as required. In brief these included;

6 Awareness

Greenwell Gleeson Ltd has ensured that decision makers and key people within the company are aware of the new law and the need to make appropriate yet proportionate adjustments if necessary to the ways of working.

We will provide information to employees around data protection and their obligations and have configured our systems to significantly limit any possible breaches.

7 Information we hold

We have documented what personal data we hold, where it came from and with whom we share it with. We have taken the approach of privacy by design, ensuring that the first thought is the privacy of those whose data we process and have accordingly limited access to data and minimising what we ask for.

8 Communicating privacy information

We have reviewed our current privacy notices and made adjustments where necessary to meet what is required under the law. When we collect your personal data, we will make available our privacy notice. This privacy notice will inform of how we handle your data and to whom and why we might share this data, in addition to explaining our lawful basis for processing the data, our data retention periods and your right to complain to the ICO if you think there is a problem with the way we are handling your data. Should you have any questions regarding it, please do get in touch.

9 Individuals' rights

Greenwell Gleeson Ltd has reviewed procedures to ensure they cover all the rights individuals have, including how we delete personal data or provide data electronically.

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These include the following:

- The right to be informed
- The right to access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- The right to not be subject to automated decision-making including profiling

10 Subject access requests

Greenwell Gleeson Ltd has updated our procedures to reflect how we will handle requests to take account of the new rules such as in most cases we will not charge for complying with a request. We will have 30 days to comply, rather than 40 days under the previous data protection laws. We can refuse or charge for requests that are manifestly unfounded or excessive. If we refuse a request, we will tell the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy.

11 Lawful basis for processing personal data

As part of compliance we have to identify the lawful basis for our processing activity and have updated our privacy notice to explain it.

12 Data breaches

There is a duty on all organisations to report certain types of data breach to the ICO, and in some cases, to individuals where it is likely to result in a risk to the rights and freedoms of individuals for example, if it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage.

13 Data Protection by Design and Data Protection Impact Assessments

Greenwell Gleeson Ltd endeavours to adopt a privacy by design approach and to carry out a Privacy Impact Assessment (PIA) as part of this, when and where necessary.

14 Data Protection Officer

Greenwell Gleeson Ltd recognises the need under the new act to have a Data Protection Officer. As a result, we have engaged a Data Protection specialist on a permanent basis to support our efforts.

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15 Suppliers GDPR Compliance

Greenwell Gleeson Ltd has undertaken a review of all supplier and third-party contracts and arrangements to ensure that all of our partners continue to apply the same high standards of data protection.

Rob Lawton, Managing Director, Greenwell Gleeson

2018