

# Branston Adams GDPR

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a privacy and data protection regulation in the European Union (EU) and became enforceable from May 25 2018 becoming binding and applicable from that date.

The GDPR imposes new obligations on organisations that control or process relevant personal data and introduces new rights and protections for EU data subjects.

The GDPR applies to data processing carried out by organisations operating within the EU. It also applies to organisations outside the EU that offer goods or services to individuals in the EU.

Branston Adams places a high importance on information security and within our organisation we already comply with a number of standards that also focus on information data security.

Branston Adams are:

Processors for our hosted client data

Controllers of our client and supplier contact information, required to; manage & deliver services under contract; manage customer requests & incidents

Controllers for personnel information in relation to our company's employees

## Our Approach

During our journey to GDPR compliance Branston Adams has been and is continuing to ensure we have the expertise required to implement the legislation requirements accurately and comprehensively.

We view GDPR as a constant programme of works that will require continuous monitoring, management and improvement.

## Work streams and actions taken

The table below shows the main activities to ensure compliance:

| REQUIREMENTS                             | ACTIVITY   |
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| Data impact Assessments & Data Inventory | <p>We have undertaken a review of the data we store, manage, maintain, collect, process and control. This includes offline storage and paper records.</p> <p>we will continue with ongoing assessments of the data we hold to ensure the lawfulness, purpose, minimisation, accuracy, consent, limitation, integrity &amp; confidentiality, record keeping and accountability are all compliant with GDPR.</p> |

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| Customer Contracts                 | All new clients sign a GDPR ready agreement, all existing clients have engagement letters that are compliant with GDPR.   |
| Policy Development                 | <p>Branston Adams takes their information security responsibilities very seriously.</p> <p>We have a process of continual review and improvement that all policies with a GDPR link will be included in, in conjunction with our internal audit plan.</p>   |
| GDPR Training and Awareness        | <p>Senior Management are fully supportive of the programme of adaption and improvement for GDPR and are aware of their corporate responsibilities.</p> <p>Internal briefings and training have been carried out with all staff.</p> <p>Enhanced training, such as DPIA and SAR is being conducted with role specific individuals within the organisation.</p> |
| Supplier and Partner Relationships | <p>A formal review in support of our internal audit framework is being conducted with all our third parties to ensure compliance with GDPR is satisfactory.</p> <p>Where required, GDPR Supplier Agreements are being completed to ensure that our third - party suppliers are compliant.</p>   |
| Technology                         | Our technology platform is supported by an ISO27001:13 certified organisation. As an organisation we continually review our technology platforms with our suppliers to analyse their operation, security and compliance to ensure that they meet the standards we have laid down, identify any gaps or risks.   |
| Privacy by Design                  | <p>Forms a compulsory consideration for all technical design alongside ISO27001:13 security by design.</p> <p>Branston Adams works with its suppliers to ensure that they are taking Privacy and Security by Design in consideration to any development and design work they undertake on our behalf.</p>   |
| DPO Appointment                    | The DPO has formal responsibility for data protection compliance within their organisation.   |

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|  | Within Branston Adams this role is performed by and shared amongst key stakeholders managing GDPR including legal, compliance, technical and senior management team representatives. Our DPO can be contacted via email <b><u>at (insert address)</u></b> |
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Please review our Privacy Notice at: **(insert address)**

Download our Statement and GDPR Compliance **(insert hyperlink to download page as a PDF)**