

# kenchadconsulting Ltd

## GDPR Compliance Statement

### Introduction

The EU General Data Protection Regulation (“GDPR”) came into force across the European Union on 25th May 2018. The new Regulation standardises data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

### Our Commitment

Ken Chad Consulting Ltd 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 recognise and take very seriously our obligations to meet the demands of the GDPR

Ken Chad Consulting Ltd are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our GDPR compliance has been summarised in this statement.

We are small (micro) business that holds very limited amounts of personal data. Much of that is simply identification information -name, emails etc- that is already in the public domain. This means our audit and policies and procedures have been relatively straightforward to implement. We do not have even tens of staff with access to systems and files across multiple devices. We have not been blasé however and take our responsibilities very seriously. In summary the key aspects have been;

- Ensure (via audit) we know how and what personal data we collect, where and how it is stored, and who has, or might have access to it
- Ensure (via policies and processes we only collect and store data appropriately and securely
- Ensure (via policies and processes) that we meet our obligations to safeguard data, satisfy appropriate Subject Access Requests and ‘Right to Erasure etc’

### Policies and procedures

#### Information Audit

We have carried out an information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.

#### Policies & Procedures

We have revised our 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 meets 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

Our retention policy and schedule ensure that we meet the 'data minimisation' and 'storage limitation' principles and that personal information is stored, archived and destroyed compliantly and ethically. We have 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 at the earliest possible time. Our procedures are robust. Because we are a small (micro) company only a very limited number of people are involved. They are aware of the reporting lines and steps to follow.

### International Data Transfers & Third-Party Disclosures

Where Ken Chad Consulting Ltd stores or transfers personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Up to now there have been no such cases. Nevertheless we keep this under review with will carry 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.

### Subject Access Request (SAR)

Our SAR procedures accommodate revised 30-day timeframe for providing the requested information and for making this provision free of charge. Our procedures 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 have reviewed 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

Our our Privacy Notice to complies 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

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.

### Direct Marketing

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)

We do not currently process personal information that is considered high risk, involves large scale processing or includes special category/criminal conviction data. Were we to do we will we have stringent procedures and assessment templates for carrying out impact assessments that comply fully with the GDPR's Article 35 requirements.

### Processor Agreements

We do not use where we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Hosting etc). Should we do so we will draft 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

We do not process any special category information. Were we to do so it will comply with the Article 9 requirements and have high-level encryptions and protections on all such data.

### **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 to information of an individual's right to access any personal information that Ken Chad Consulting processes about them and to request information about: -

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- 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, 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 Organisational Measures**

Ken Chad Consulting has robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures.

### **GDPR Roles and Employees**

Ken Chad Consulting have designated **Ken Chad** as our **Data Protection Officer (DPO)/Appointed Person**. He is responsible for awareness of the GDPR, assessing GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures.