

DISTRIBUTION MANAGEMENT GDPR Compliance Statement

Introduction

The **EU General Data Protection Regulation (“GDPR”)** came into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardize data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

Our Privacy Policy can be found here: <http://www.distributionmgmt.com/Privacy-Policy>

Our Commitment

DISTRIBUTION MANAGEMENT is 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 had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR and the UK’s Data Protection Bill.

At **DISTRIBUTION MANAGEMENT**, we 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 preparation and objectives for GDPR compliance have been summarised 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 DISTRIBUTION MANAGEMENT is complying with the GDPR

Currently, **DISTRIBUTION MANAGEMENT** maintains a consistent level of data protection and security across our organization, and we have implemented the necessary policies and procedures to ensure compliance with the GDPR and the UK’s Data Protection Bill. **Our preparation includes:** -

- **Information Audit** – Our GDPR compliance program includes an ongoing company-wide information audit to continuously 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. We also maintain
- **Policies & Procedures** – We have revised and implemented 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 have updated our retention policy and schedule to 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 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 **DISTRIBUTION MANAGEMENT** 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. Our procedures 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 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)** – We have revised 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 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 and continue to review 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.
 - If you are a **current customer**, an **employee**, or a **job applicant**, the personal information we hold, may be used because it is necessary for the **performance of the services contract** to which you are a party, because it is necessary for our **legitimate interest** in processing such personal information in the context in which you provided it to us, or for another lawful basis. We will endeavor to inform you of the legal basis for collection of your personal information prior to or at the time we collect it.
 - If you are a **prospective customer**, the personal information we collect, and use is necessary for our **legitimate interest** in providing you with information about the

services we offer, and about which you have expressed an interest or that we believe will be of benefit to you. If another legal basis applies to our collection and use of your data, we will endeavor to inform you prior to or at the time we collect it.

- In some cases, our legal basis for collecting your personal data is because you have expressly consented to our collection and use of your personal information.
- **If you object to the processing of your personal information under these basis, please contact our privacy team at privacy@distributionmgmt.com .**
- **Privacy Notice/Policy** – We have revised 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.
- **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 (*i.e. Payroll, Recruitment, Hosting etc*), we have drafted 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 request, require, process or store special categories of 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 information via our website of an individual’s right to access any personal information that **DISTRIBUTION MANAGEMENT** 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 Organizational Measures

DISTRIBUTION MANAGEMENT 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 Technical security measures such as;

- Secure Inventory and Asset management for all Hardware & Software assets containing EU residents' data.
- Secure Network Architecture and proper data segregation
- Secure configuration standards for Hardware and Software assets
- A continuous vulnerability management and remediation program
- Proper Identity and Access Management controls
- Secure maintenance, monitoring and analysis of audit logs
- Proper Intrusion prevention, Perimeter and Malware Defenses
- A well-test and functioning Disaster Recovery & Business Continuity Program
- Data-at-Rest & Data-in-Transit protections such as Data loss prevention and encryption
- Access to customer data is controlled on a need-to-know basis and monitored.
- All employees undergo mandatory privacy and security awareness training on a regular basis.
- A functioning incidence response and management program
- Annual Security Assessments are conducted by an external 3rd party security company.

GDPR Roles and Employees

DISTRIBUTION MANAGEMENT has designated an internal Data Privacy Officer and have appointed a data privacy team to develop and implement our roadmap for complying with the new data protection Regulation. The team are 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.

DISTRIBUTION MANAGEMENT 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 the GDPR which will be provided to all employees, and forms part of our induction and annual training program.

If you have any questions about our preparation for the GDPR, please contact our Data Privacy Team at privacy@distributionmgmt.com