

GDPR COMPLIANCE STATEMENT

STARBRITE CHEMICALS LIMITED

Introduction

The **EU General Data Protection Regulation (“GDPR”) Regulation (EU) 2016/679** comes 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. Founded on the fundamentals of privacy by design and a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

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

Our Commitment

Starbrite Chemicals Limited 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 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 the requirement and importance of updating and expanding this to meet the demands of the GDPR.

Starbrite Chemicals Limited are 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 plans for the GDPR have been summarised in this statement and includes 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

Starbrite Chemicals Limited already has a consistent level of data protection and security across our organisation, however it is our aim to be fully compliant with the GDPR by 25th May 2018. *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 and if and to whom it is disclosed.
- **Policies & Procedures** - 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 updated 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 reviewed our retention requirements 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 systems 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 possibility. Our procedures are robust and have been disseminated to all employees, who are aware of the reporting lines and steps to follow.
- **Subject Access Request (SAR)** – we have revised our SAR procedures to accommodate the revised 1-month timeframe for providing the requested information and for making this provision free of charge. Our new procedures include verification of the data subject, what steps to take for processing an access request, what exemptions apply and will ensure that communications with data subjects are compliant, consistent and adequate.
- **Privacy Policy** – we have updated our Privacy Policy 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 reviewed 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 implemented processes for recording consent, making sure that we can evidence an affirmative opt-in, and an easy way to withdraw consent at any time.
- **Direct Marketing** - we will ensure the wording and processes for direct marketing, include clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on any subsequent marketing materials.
- **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 ongoing reviews of the service provided, the necessity of the processing activity, the technical and organisational measures in place and compliance with the GDPR.

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 at **Head Office, located at Unit 27, Bolney Grange Business Park, Stairbridge Lane, Bolney, West Sussex RH17 5PB** of an individual’s right to access any personal information that **Starbrite Chemicals Limited** 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

Starbrite Chemicals Limited takes the privacy and security of individuals and their personal information very seriously and are taking every reasonable measure and precaution to protect and secure the personal data that we process. We have information security procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures, including: -

- **access controls,**
- **password policy,**
- **encryptions,**
- **access restriction,**
- **authentication**

GDPR Roles and Employees

Starbrite Chemicals Limited regularly reviews data privacy and continue to develop and implement our compliance with the new data protection Regulation. Staff members are responsible for promoting awareness of the GDPR across the organisation, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures.

We utilise a GDPR checklist designed by the ICO to assess each business activity, function and process and to ensure that we have a company-wide approach to meeting the new standards and requirements.

Starbrite Chemicals Limited 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 ensured employees have been updated with GDPR regulations and this will also form part of our employee induction program.

If you have any questions about our preparation for the GDPR, please contact us.