

# **Fincomp Services Limited**

## **GDPR Compliance Statement**

The EU General Data Protection Regulation (“GDPR”) comes into force across the European Union on 25<sup>th</sup> 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.

Fincomp Services Limited (“us” or “we”) are committed to ensuring the security and protection of the Personal Data that we process, and to provide a compliant and consistent approach to data protection.

### **What have done to be GDPR-ready**

As part of our continuous focus on information security and data privacy we are preparing to be fully compliant with the GDPR by 25<sup>th</sup> May 2018. Our preparation includes:

#### Information Audit

We have completed a company-wide information audit to identify and assess what Personal Data we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.

#### Policies

We have implemented the following data protection policies to meet the requirements and standards of the GDPR and any relevant data protection laws:

- [Data Protection Policy](#)
- [Data Breach Policy](#)
- [Information Security Policy](#)
- [Subject Access Request Policy](#)

#### 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. We also maintain records of our processing activities.

#### Privacy Notice

We have revised our [Privacy Notice](#) to comply with the GDPR, ensuring that all individuals whose Personal Data 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.

#### Processor Agreements

Where we use any third-party to process Personal Data on our behalf we have ensured compliant Processor Agreements will be in place by 25<sup>th</sup> May 2018. We have also created a Data Processor Due Diligence Questionnaire to ensure 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 administrative, physical and technical procedures in place and compliance with the GDPR.

### **Data Subject Rights**

In addition to the policies and procedures mentioned above, to ensure individuals can enforce their data protection rights, we provide easy-to-access information via our [Subject Access Request Policy](#) on our website to an individual's right to access any Personal Data that we process 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 their 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**

We have taken every reasonable measure and precaution to protect and secure the Personal Data that we process. This includes creating an [Information Security Policy](#) which contains robust policies and procedures designed to protect Personal Data from unauthorised access, alteration, disclosure or destruction.

### **GDPR Roles and Employees**

Our Chief Information Officer (CIO) has been overseeing our GDPR preparations. The CIO has promoted awareness of the GDPR throughout the organisation, assessed our GDPR readiness, identified any gap areas and implemented new policies, procedures and measures.

We understand that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have implemented an employee training program specific to the GDPR which will be provided to all employees prior to 25th May 2018 and annually thereafter.

If you have any questions about our preparation for the GDPR, please write to **Chief Information Officer, Fincomp Services Limited, 2 Keswick Road, Twickenham, TW2 7HL** or email [cio@fincomp.co.uk](mailto:cio@fincomp.co.uk).