

## **OUR GDPR OBLIGATIONS**

THINCS Ltd understands that the focus on individual rights (as well as transparency and accountability for the collection and handling of personal data) places EU residents and their rights at the heart of GDPR. Therefore, we will ensure that our organisation makes all the necessary changes in order to support the GDPR regulations. These include the Right To Be Forgotten, the Right To Data Portability and the Right To Object To Processing. As such, we will consider all aspects of data processing activities, storage and disposal of all personal data.

In addition, we accept that the new regulations strengthen compliance requirements including new rules on consent and clear definition of how data is to be used. We will adopt a Privacy by Design ethos and complete Impact Assessments (where necessary) to understand how best to guarantee data is kept secure.

We also accept the need for transparency, including Breach Disclosure Requirements to notify authorities; and in some cases, data subjects within 72 hours.

### **Our strategy is based on the following key principles:**

We will be a responsible custodian of customer and employee data.

We will assign clear ownership for data privacy across the company starting at the highest levels, with clear responsibility and accountability for all aspects of data security throughout the organisation.

We will establish a formal inventory of data processing operations and supporting systems that collect, process and store personal data.

We will review and verify the legal basis for collecting and processing personal data; as well as the legal means for any cross-border (outside Europe) transfers and communicate this clearly with all data subjects.

We will regularly review all systems and processes, identify gaps and develop a plan to achieve compliance within the new regulations.

We will review partners and vendors to establish current contract terms and agreed

upon data protection controls.

We will ensure we can support individuals exercising their rights under the GDPR.

THINCS Ltd fully supports the requirements of the GDPR and will ensure appropriate resources and funding are available to meet these obligations in preparation for 25<sup>th</sup> May 2018 implementation.

We are adopting a risk managed approach and acknowledge that there may be gaps in implementation. However, we will have completed high priority tasks, review and made significant changes in order to support the GDPR.