

GDPR Compliance Statement

Introduction

On the 25th May 2018, the European Union General Data Protection Regulation (GDPR) becomes law. This new regulation introduces significant changes to the existing data protection laws. The new regulation is based on privacy by design and by taking a risk-based approach, it has been designed to meet the requirements of the digital age.

As the use of technology grows, there will be an ever-increasing growth of personal data being exchanged between countries, the new Regulation aims to standardise data protection laws across the EU. The regulation gives the individuals rights to control their personal information and to know who has their data and how it is being used. Any country that wants to trade with the EU must also make sure that they comply with the new regulations and that their own data protection laws give the user the same rights.

Pulsar Commitment

Pulsar Process Measurement Limited (Pulsar) takes the security and protection of personal data seriously and ensure that our systems are fully compliant with the existing data protection laws and have been expanded to incorporate the new GDPR regulations were necessary. The preparation and objectives that Pulsar introduced to ensure they meet the new regulations are listed in this statement and include any new procedures, policies or roles to ensure the company are compliant in time for the 25th of May 2018 and that they remain compliant in the future.

Pulsar GDPR Preparation

Pulsar already maintains a secure solution in respect of data protection and the aim is to ensure it is fully compliant with the new GDPR regulations by **25th May 2018**.

Gap Analysis Pulsar employed an external consultant, CIS Limited, to carry out a gap analysis audit to identify and assess if any of our existing policies and procedures failed to meet the new regulations in regards to personal data. This included where the data comes from, how we hold it, who can access the information and how the company uses that information.

Reviewing existing Policies & Procedures all of Pulsar's existing policies and procedures were reviewed to ensure that they met the new requirements of GDPR and any shortfalls were covered by new policies and procedures.

Introduce New Policies & Procedures Pulsar has amended or introduced new policies and procedures to ensure that the company are compliant under the new GDPR regulations. These are:

Data Breaches Pulsar has updated the data breach procedure to ensure that all staff are aware of the line of management and who to report any data breaches to, along with the relevant steps to follow. The process investigates, identifies, assesses and reports a data breach within the allotted time frame under the new GDPR regulations.

Data Consent Register Pulsar has introduced a data consent register that lists all the areas that need consent, how the consent was given along with a copy of the consent and any supporting documentation. This will ensure that no personal data can be used for any other purpose and ensure Pulsar remain compliant.

Data Protection Impact Assessments (DPIA) where Pulsar process personal data that is classed as sensitive personal data, new procedures for carrying out impact assessments have been introduced.

Data Subject Access Request Pulsar has introduced a Subject Access Request which conforms to the GDPR requirements. The procedures state that all requests will be handled within 30 days and any information will be made available for free. The procedure explains how to recognise a data access request, who handles the request, how the data will be collated, what format the data will be supplied

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in, how to validate the request, date of request, date of delivery and how the company stores the request information.

Direct Marketing Pulsar is revising the wording used for direct marketing, and ensuring that a clear opt-out, unsubscribe procedure from marketing subscriptions is present in all marketing material.

Legal Basis for Processing - Pulsar is reviewing all of its processing activities to identify the basis for processing and ensuring that each basis is appropriate for the activity it relates to.

Obtaining Consent Pulsar has updated our consent procedures for obtaining personal data, so that it is clear why we are asking for the information, what purpose it will be used for, who will have access to and how we use the data, as well as a clear method for revoking any consent that has been given.

Privacy Notice Pulsar has rewritten the Privacy Notice so that it complies with the GDPR requirements, Pulsar has ensured that it has contacted all individuals whose personal data is held, informing them of why we need it, how it is used, what their rights are, who the information is disclosed to and what security measures are in place to protect their data.

Retaining & Deleting of Data Pulsar has introduced a new data retention policy and schedule to ensure that data minimisation and storage limitation guidelines are adhered to and that personal data is stored, archived and destroyed compliantly and ethically.

Risk Assessment Register Pulsar has identified the GDPR risks to the business and have entered the details into the risk assessment register.

Third Party Processing Pulsar use third-party processing for several of its key processes. Where these processes are in place, a suitable Processor Agreement is in place to ensure that they are GDPR compliant and can meet both parties obligations as required by GDPR. Also, ongoing reviews of these services and agreements are in place to ensure they remain compliant.

Subject Rights

Pulsar has also ensured that individuals can enforce their rights under the new GDPR regulations in addition to the procedures and policies listed. Individuals can enforce their data protection rights and are advised of these methods via Office Notice Boards, details included in induction packs and removal details on all personal data forms that they are requested to fill in.

An individual has the right to access any personal information that **Pulsar** holds regarding them and they can request

- Details regarding the personal data Pulsar has
- The reason why they hold the data
- What sort of data is held, personal, sensitive etc
- Who else has seen the data / will see the data
- For how long the company intends to retain the data
- How did we obtain the data if they did not provide it
- The right to have mistaken or partial data corrected or completed
- How to correct the data
- The right to remove personal information (*where applicable*)
- The right to stop processing incorrect data
- The right to object to any direct marketing
- To be advised regarding any automated decision-making procedures 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

Pulsar takes individuals' security and privacy of their personal information very seriously and take every reasonable precaution to protect the personal data that the company holds. Pulsar protects personal data from



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unauthorised access, disclosure, deletion or alteration by deploying multiple layers of protection, including but not limited to: -

Authentication and password policies, access controls, data encryption, and SSL.

GDPR Roles and Employees

Pulsar, legally does not have to designate a Data Protection Officer due to the size of the business, less than 250 employees and does not engage in any other activities that would warrant a Data Protection Officer being appointed.

However, Pulsar has designated Mr. Chris Hone as our DPO/Appointed Person and has introduced a data privacy team to implement our compliance roadmap to ensure that the company comply with the new data protection regulations. Duties of the team are to promote awareness of the new regulations, continue to monitor and assess the company's compliance by spotting any gaps within our policies and procedures, and introduce new measures as needed.

Pulsar recognises employee understanding and willing participation is key to the continued compliance of GDPR and has actively engaged with employees to have a successful GDPR implementation. Pulsar has provided all existing employees with a GDPR overview and it is now included as part of the induction process for new starters.

Should you have any queries or questions regarding the implementation of GDPR at Pulsar please contact Chris Hone, chris@pulsar-pm.com.