

## 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 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

We at NBRL (Navigate Business Recovery 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 laws and abides by data protection principles. However, we are updating and expanding this program to meet the demands of the GDPR.

NBRL is dedicated to safeguarding the personal information in our care and in developing a data protection system 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 we, at Navigate Business Recovery Limited, have prepared for the GDPR

We have a consistent level of data protection and security across our organisation, however it is our aim to be fully compliant with the GDPR. Our preparation includes: –

**Information Audit** – carrying out an organisation-wide information audit to identify 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** – implementing new data protection policies and procedures to meet the requirements of the GDPR, including: –

**Data Protection** – our main policy and procedure document for data protection has been revised to meet the requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand 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 shared with all employees, making them aware of the reporting lines and steps to follow.

**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 are reviewing 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.

**Privacy Notice/Policy** – we are revising 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.

**Processor Agreements** – where we use any third-party to process personal information on our behalf, we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they meet and understand their 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.

## 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 personal information that NBRL 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

NBRL 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 unauthorised access, alteration, disclosure or destruction and have several layers of security measures.

## GDPR Roles and Employees

NBRL have a designated Data Protection Lead who is responsible for promoting awareness of the GDPR across the organisation, implementing the new policies, procedures and measures.

We have engaged a data protection consultant to assess our GDPR readiness, identifying any gap areas and develop and implement our roadmap for complying with the new data protection Regulation.

NBRL understands that continuous awareness and understanding is vital to the continued compliance of the GDPR. We have implemented a training program which will provide to all employees who handle personal data and forms part of our induction and annual training program.

If you have any questions about our preparation for the GDPR, please contact [vee@navigatebr.com](mailto:vee@navigatebr.com)