

## Data Protection

The EU General Data Protection Regulation (“GDPR”) 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. 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 21st Century brings with it broader 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**

MAV Systems Ltd 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 our obligations in updating and expanding this program to meet the demands of the GDPR and the UK’s Data Protection Bill.

MAV Systems Ltd are dedicated to safeguarding the personal information under our remit and have developed a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for, the new Regulation. Our preparation for GDPR compliance has been summarised in this statement and include the development and implementation of new data protection duties, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

### **Planning and Implementation**

MAV Systems Ltd already have a consistent level of data protection and security across our organisation and have conducted business wide changes to enhance these measures in line with the demands of GDPR and best practice.

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 – Revising 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 overhauled 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 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 disseminated to 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 where appropriate.

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. 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.

Obtaining Consent – we have revised 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 developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.

Direct Marketing – we have revised the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.

### **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, and the foot of this document, of an individual's right to access any personal information that MAV Systems Ltd processes about them and to request information about: –

- What personal data we hold about them
- The purposes of the processing
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for

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



MAV Systems Ltd 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, including: –

- Security monitored offices
- Password policy
- Limited Access measures
- Encryptions
- Isolated IT infrastructure
- GDPR Roles and Employees

MAV Systems Ltd have designated Neil Dillon as our Appointed Person and have appointed a data privacy team to implement our roadmap for continuing compliance with the new data protection Regulation.

MAV Systems Ltd 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.

Should any business wish to find out what information we hold on them, ask for information to be updated or request the removal of any data that we may be in possession of, a dedicated contact email address has been set up – [mav.gdpr@mav-systems.com](mailto:mav.gdpr@mav-systems.com)