



GDPR compliance statement

The General Data Protection Regulation ('GDPR') applies from 25th May 2018 and imposes increased responsibilities on data controllers and data processors to ensure personal information is held and processed lawfully and in a secure manner. It also provides enhanced rights for individuals to access their data and control how it is used.

Generate has always taken its data protection responsibilities seriously and we consider the security of the personal information we hold to be a cornerstone of our operations. To ensure we continue to maintain the highest data protection standards, we have conducted a full review and update of our data protection policies and controls in advance of GDPR coming into force.

GDPR Compliance

We are pleased to confirm that we will be fully compliant with GDPR by 25th May 2018 and outline further detail below.

Roles and responsibilities

We are not required to appoint a Data Protection Officer 'DPO', as:

- we are not a public authority
- our core activities do not involve the regular and systematic monitoring of data subjects
- our core activities do not consist of large scale processing of special categories of data or data relating to criminal convictions and offences

Nevertheless, GDPR compliance is our highest priority and, as such, responsibility for all data protection and security issues lies with the Finance Director.

Data protection policy

We have updated our data protection policy to ensure full compliance with GDPR. A copy is available on request and can also be found on our website at www.generate-fs.co.uk.

Privacy notices

We have updated our privacy notices to ensure that all individuals are aware how we collect, use, store, transfer and secure their personal data. These notices also inform individuals of their rights of access, correction, erasure and restriction under GDPR.

Data processing and storage

We have carried out a comprehensive analysis of the personal data we hold, including where it is stored, how it is processed and who it is shared with.

We have also conducted a full review of how and why we process data. In each case, we have identified and documented the legal basis for the processing. Individuals will be informed of the relevant legal basis in their privacy notice.

Subject Access Requests ('SARs')



We have updated our processes for dealing with SARs to ensure that all requests are processed and satisfied within the timescale prescribed by GDPR, including provisions to verify the identity of the data subject and to ensure any data is provided in a secure manner.

Data retention and erasure

We have updated our data retention and erasure policy to ensure that personal information is held for no longer than is strictly necessary for the purpose for which it is being processed and that data erasure is carried out securely and compliantly.

We have also introduced new processes to ensure compliance with the 'right to be forgotten', which will ensure that any such requests are implemented to the fullest extent possible whilst maintaining our other ongoing legal obligations.

Information security

We have an ongoing cybersecurity programme to ensure the personal information we hold is subject to the highest level of protection. We have several layers of security measures in place, including:

- SSL security
- Encryption of data
- Restricted access to data
- IT authentication
- Firewalls
- Anti-virus/malware software

We have also updated our information security policy and processes to ensure full compliance with GDPR.

Data breaches

We have updated our processes to ensure that we identify any data breaches at the earliest possible opportunity and comply with the new reporting requirements under GDPR.

Training

Our employees will all complete a programme of data protection training by 25th May 2018 to ensure they understand the principles underlying GDPR and are fully up to speed with our updated policies and processes. New employees will undergo the same training and we will also conduct regular refresher courses on an ongoing basis to ensure we uphold our commitment to maintain the maximum level of data protection.

If you have any queries regarding our GDPR compliance, please email gdpr@generate-fs.co.uk.