

GDPR COMPLIANCE STATEMENT

Introduction

The EU **General Data Protection Regulation (“GDPR”)** came into force across the European Union on the 25th of May, 2018. The GDPR has been designed to meet the requirements of the digital age. The GDPR standardises data protection laws and processing across the EU which will give individuals stronger, more consistent rights to access and control their personal information.

Our Commitment

Static Control Components (Europe) Limited (“*Static Control*”, “*we*”, “*us*” or “*our*”) is committed to ensuring the complete security of the personal information that we process and to providing a robust approach to data protection. We have always had an effective data protection program in place which has complied with all existing laws as well as abiding by all the relevant data protection principles. However, we have worked to update and expand this program to meet the demands of the GDPR and the UK’s Data Protection Bill. Our program for GDPR compliance has included the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

GDPR Compliance

Static Control has taken the following actions to insure its compliance with the GDPR:

- **Information Audit** – We carried 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** – We revised existing 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

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possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.

- **International Data Transfers & Third-Party Disclosures** – in cases where we may store or transfer personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include a continual review of the countries with sufficient adequacy decisions, as well as provisions for binding corporate rules, standard data protection clauses or approved codes of conduct for those countries without. We carry out strict due diligence checks with all recipients of personal data to assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.
- **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. For more complex requests, we reserve the right to extend the response time by a further two months in accordance with the GDPR.
- **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 have revised 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.
- **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.
- **Processor Agreements** – where we use any third-party to process personal information on our behalf (*i.e. Payroll, Recruitment, Hosting etc*), we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they (*as well as we*), meet and understand their/our 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.

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Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide information regarding an individual's right to access any personal information that we process 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 the 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

Static Control takes the privacy and security of individuals and their personal information very seriously and we 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.

We have designated **Neil Head** as our **Data Protection Officer (DPO)**. If you have any questions about this document or our GDPR compliance programs and policies, please feel free to contact Neil Head at DPO@scceurope.co.uk.

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