

STL and GDPR

Introduction

The EU General Data Protection Regulation (GDPR) will apply in the UK from 25 May 2018 and will supersede the current Data Protection Act 1998. The Government has confirmed that the UK's decision to leave the EU will not affect the commencement of GDPR, and will impact all organisations that control or process personal data. Data subjects will have more control over how their data is used. Organisations including STL will be subject to new responsibilities and obligations, including the need to demonstrate compliance.

What are we doing to ensure compliance?

STL is committed to protecting and respecting the privacy of individuals, and we take our obligations under data protection legislation seriously. We understand and welcome the high standards that GDPR will promote and encourage across all organisations that process personal data on behalf of third parties.

Our project team has the following key priorities:

• Modify and fine tune our existing ISO 9001/1400 management systems, processes and policies and aligning with ISO 27001 to ensure that we are GDPR-compliant.

• Ensure that our employees and consultants are fully aware of the new obligations that GDPR will introduce, and ensure that there is accountability and shared responsibility for ensuring compliance, from Board level and throughout the company.

• Provide a range of products and services to our customers to assist them in preparing for GDPR, including specific support to those who use our technological solutions (such as our specially configured data-capture software), to ensure that such solutions are compliant.

We understand the importance of good data practices to our customers. Some of the specific initiatives that we are currently progressing include:

• **Data Review** – An extensive review of all personal data we hold, as we prepare a detailed data roadmap which outlines where this data is held, why we hold it and for how long.

• **Contractual Updates** – A full-scale analysis of third parties who process data on our behalf, and updates to contracts to ensure the best possible protection. In addition to this, we are updating our current business terms and conditions to give our customers the assurances required by GDPR.

• **Process Updates** – Updates to our existing procedures to ensure we have the tools to maintain compliance with GDPR, and a review of our existing policies such as our data security and

incident management response.

• **Improved Subject Access** – Updates to our existing subject access request processes to ensure that it is easier and quicker for data subjects to exercise their rights.

• **Review of consents** – Review of our existing marketing practices, and associated consents, to ensure that these are transparent, fair and GDPR-ready.