

GDPR Compliance Statement

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 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

Final Say and associates (*'we' or 'us' or 'our'*) 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 Act 2018.

Final Say and associates are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our 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.

Final Say and associates have a consistent level of data protection and security which includes:-

- **Information Audit** - carrying out information audits 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 reviewed 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 data protection 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.

- o **Data Breaches** – our 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 associates, making them aware of the reporting lines and steps to follow.
- o **Third-Party Disclosures** – Final Say and associates carry out strict due diligence checks with all recipients of personal data, where applicable, 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.
- o **Subject Access Request (SAR)** – our SAR procedures accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge. All Subject Access Requests can be made to Final Say and associates by email to lpa@finalsay.pro specifying in the subject line Subject Access Request.
- **Legal Basis for Processing** - we continually review 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 Act are met.
- **Privacy Policy** – we have revised our Privacy Policy to comply with the GDPR, ensuring that all individuals whose personal information we process are aware of how it is used, who the information may be 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.
- **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

Data Subject Rights are set out in the Privacy Policy and Data Protection Policy mentioned above that ensure individuals can enforce their data protection rights, and are easily accessible via our website www.finalsay.pro/policies.html

Information Security & Technical and Organisational Measures

Final Say takes the privacy and security of individuals and their personal information very seriously and takes every reasonable measure and precaution to protect and secure the personal data that we process from unauthorised access, alteration, disclosure or destruction.

GDPR Roles

Julie Anne Allison, for Final Say, is the designated Data Protection Officer who is responsible for complying with the Data Protection Act 2018.

If you have any questions about these policies, please contact Final Say by email at lpa@finalsay.pro