

## DATA PROTECTION AND GDPR STATEMENT

At WOVEX, we take the utmost care to prevent the unauthorised use or disclosure of information that our customers, employees and partners provide. Our Board works closely, and internationally, with our Partners, Information Management, Information Technology, Risk Management, Corporate Security, Human Resources and Product Development groups to develop, maintain and enforce robust privacy and information security policies and practices at WOVEX.

Our success depends directly on the confidence our customers have in the capability, performance and security of our products and services. To ensure this, we have policies and controls in place to provide privacy protection for personally identifiable information maintained by WOVEX. Our policies follow industry best practices, including the use of encryption technology and data loss protection software.

GDPR REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) follows practises outlined in data protection procedures. WOVEX have identified polices and procedures that support GDPR in addition to its data protection policy. We have ensured all decision makers and key people in WOVEX are aware that the law is changing to the GDPR. WOVEX have documented what personal data we hold, where it came from and who we share it with and identified processing activities related to the data. We have reviewed our current privacy notices and put a plan in place which will be completed before 25<sup>th</sup> May 2018. When we collect personal data we currently give people certain information, such as our identity and how we intend to use your information. This is usually done through a privacy notice. Under the GDPR there are some additional things we will tell people. For example, we will explain the lawful basis for processing the data, the data retention periods and that individuals have a right to complain and how to do this in the first instance writing to the CEO setting out your complaint. This does not dilute, reduce or effect your rights.



## GDPR and how it impacts individual rights

the right to be informed
the right of access
the right to rectification
the right to erasure
the right to restrict processing
the right to data portability
the right to object
the right not to be subject to automated decision-making including profiling

The right to restrict data portability and automated decision making including profiling are new as part of GDPR and in addition to WOVEX data protection policy. WOVEX have implemented a policy internally to ensure any private data held for reasonable reasons is defined and justified. Data is not transferred but held in an encrypted format and is not externally portable. Information held by WOVEX has always been treated with respect and has never been transferred outside the boundary of reasonable internal use. WOVEX have in addition introduced a single instance use of data which is managed on a need to know basis. WOVEX personal data is restricted to customer data that is held to enable WOVEX to deliver its products and services. This data is encrypted and is only used to carry out their duties to deliver services and products to its customers. WOVEX also retains a marketing data base. This is a list of individuals and companies that have opted in by 25th May 2018. As part of the consent to opt in to receive information our customers will on each instance receive and unambiguous message to opt out. Our marketing data is; clear, specific, granular, prominent, opt-in only, properly documented and easily withdrawn. No individual under the age of 18 will be sent or request opt in requests.

The Article 29 Working Party has produced guidance for organisations on the designation, position and tasks of DPOs. Preparing for the General Data Protection Regulation (GDPR) WOVEX takes its duties to protect individual data seriously. The CEO of the company holds the ultimate responsibility to ensure all elements of the WOVEX data protection policy and new elements introduced by GDPR are implemented in the UK, Europe and Internationally.