



## **Sir Joseph Isherwood Limited — GDPR Compliance Statement**

### **Commitment**

Sir Joseph Isherwood Limited is committed to the principles inherent in the GDPR and particularly to the concepts of privacy by design, the right to be forgotten, consent and a risk-based approach. In addition, we aim to ensure:

- Transparency with regard to the use of data;
- That any processing is lawful, fair, transparent and necessary for a specific purpose;
- That data is accurate, kept up to date and removed when no longer necessary;
- That data is kept safely and securely.

### **Staffing**

Our Data Protection Officer (DPO) is Stephen Thompson. He will promote awareness of the GDPR throughout the organisation and oversee the organisation's commitment to best practice. He will inform and advise the organisation and monitor its compliance.

### **Policy**

Our GDPR Privacy Standard is available upon request. It forms part of the induction training of all new staff and follow-up sessions will be put in place if the legislation changes or further guidance is available.

### **Right to be forgotten**

Sir Joseph Isherwood Limited recognises the right to erasure, also known as the right to be forgotten, laid down in the GDPR. Individuals should contact the Data Protection Officer with requests for the deletion or removal of personal data. These will be acted on provided there is no compelling reason for continued processing and that the exemptions set out in the GDPR do not apply. These exemptions include where the personal data is processed for the exercise or defence of legal claims and to comply with a legal obligation for the performance of a public interest task or exercise of official authority.

### **Subject access requests**

Sir Joseph Isherwood Limited recognises that individuals have the right to access their personal data and supplementary information and will comply with the one-month timeframe for responses set down in the GDPR. As a general rule, a copy of the requested information will be provided free of charge although Sir Joseph Isherwood Limited reserves the right to charge a "reasonable fee" when a request is manifestly unfounded or excessive, particularly if it is repetitive. If this proves necessary, the person concerned will be informed of their right to contest our decision with the supervisory authority (the Information Commissioner's Office (ICO)).

As set out in the GDPR, any fee will be notified in advance and will be based on the administrative cost of providing the information.

## **Privacy**

Sir Joseph Isherwood Limited will implement data protection as required by the GDPR. The GDPR Privacy Standard, which is available upon request and can be provided to anyone from whom we collect data, explains our lawful basis for processing the data and gives the data retention periods. It makes clear that individuals have a right to complain to the ICO.

## **Data transfers outside the EU**

Should a transfer of any personal data outside the EU be required, Sir Joseph Isherwood Limited has procedures and safeguarding measures in place to secure and maintain the integrity of any personal data.

## **Children**

The GDPR provides for special protection for children's personal data. Whilst Sir Joseph Isherwood Limited does not intend to process children's personal data, it will comply with the requirement to obtain parental or guardian consent for any data processing activity involving anyone under the age of 16, should such processing be required. Systems have been introduced to verify individuals' ages.

## **Data loss**

If a data breach occurs that is likely to result in a risk to the rights and freedoms of individuals, the people affected will be informed as soon as possible and the ICO will be notified within 72 hours of notification of the breach.

## **GDPR contact**

Any questions related to GDPR or to issues concerning data protection generally should initially be addressed to the Data Protection Officer Sir Joseph Isherwood Limited (data.protection@isherwoods.com).