

Statement of Intent

AIC Group company recognises the GDPR (General Data Protection Regulation) and has identified it as an item of mandatory legislation in our register of legislation and regulation, that i.e. the relevant parts of it taking the context of our business into account, should be complied with so as to protect, so far as reasonably practicable, the personal data that we hold and / or process in the course of conducting our business. Our company had already registered under the 1998 DPA (Data Protection Act) with the ICO (Information Commissioner's Office) and we are now re-developing and gradually implementing our personal data related processes to ensure compliance with the new or enhanced requirements of the GDPR.

Responsibilities

Responsibility for this policy ultimately lies with the Managing Directors, Conor Donnelly and Lorcan McGillan. This includes the responsibility to ensure the provision of adequate resources for its implementation and regular assessment.

Arrangements & Implementation Plan

- Identify all types/ categories of personal data being held and/ or processed, paying attention to and identifying, if applicable, special category data and/ or Criminal offence data. It should be noted that we recognise and will address data in whatever form it takes including electronic data and hard copy of that data and conventionally hand-written e.g. 'wet ink' information
- Lawful basis for processing; Decide on this for each type/ category of data identified by, i.e. the 6 categories of lawful basis of processing being: Consent; Contract; Legal obligation; Vital interests; Public task; Legitimate interests
- Be aware of, fully understand and ensure documented processes are in place to ensure that each of the Individual's (person's) 8 rights – listed as follows – can and will be respected and put into practice if or when appropriate or necessary: Right to be informed; Right of access; Right to rectification; Right to erasure; Right to restrict processing; Right to data portability; Right to object; Rights related to automated decision making including profiling.
- Accountability and governance
- Contracts
- Documentation
- Establish a data protection management system, documented so far as considered necessary or appropriate with appropriate training provided to those people in the organisation who will be required to be responsible for and operate it, to encompass, as a minimum, the following mandatory requirements and respective supporting processes: Data protection by design and default; Data protection impact assessments; Data protection officers; Codes of conduct and certification, Data security, International transfers, Personal data breaches, Exemptions, Applications and Children

- To establish, in consultation with the ICO, any change (in relation to the GDPR over and above the current fee payable under the DPA) in the data protection fee payable to the ICO for continued and appropriate ICO registration

Performance Management, Monitoring and Review

Compliance with this policy and associated arrangements will be assessed as part of AIC Group's active monitoring regime, including Annual Management Review and Safety Culture Surveys if appropriate. Implementation of this policy will be monitored on a monthly basis through the monitoring and reporting of health and safety performance statistics. This policy and its associated arrangements will be reviewed at least annually.

Authorisation

 _____	11/11/2020	 _____	11/11/2020
Conor Donnelly (Managing Director)		Lorcan McGillan (Managing Director)	