

UK GDPR Compliance Statement

May 2018

General Data Protection Regulation

We know the General Data Protection Regulation (regulation (EU) 2016/679) (“GDPR”) is coming and that it means a big change to existing data protection law to reflect the growth of the global digital economy and the associated privacy issues this poses for individuals. The GDPR will apply directly to EU member states from 25 May 2018.

Within this statement we wanted to highlight to our customers and suppliers the measures we have put in place to ensure compliance with the GDPR where we hold or process personal data on your behalf.

Processing Personal Data

AURES Technologies Limited is a POS hardware designer and manufacturer and we process personal data, including:

- Marketing data: this is personal data relating to recipients and potential recipients of our marketing and promotional materials. We process the names and contact details with our contacts and other interested parties. We recognise ourselves as controller of this information and take steps to ensure that it is processed in compliance with data protection laws.
- Customer data: this is personal data relating to individuals working for our customers and potential customers. We process the names and contact details of the individuals in order to fulfil contracts and manage the relationship with our customers.
- Supplier data: this is personal data relating to individuals working for our suppliers. We process contact details of those individuals in order to fulfil contracts and manage the relationship with our suppliers.

We may act as a processor of data on behalf of our customers. We would not process this ‘3rd party’ data for any self-defined purpose.

Our contract terms and the supporting privacy notice are being updated to reflect the GDPR requirement for greater transparency.

Record keeping

We have been looking at all the types of personal data we process and are in the processing of conducting a review our legal basis for processing such data under GDPR. We rely on obtaining the consent of the data subject only where no other ground for processing is available. Any such consent will be reviewed to ensure we are able to satisfy the new requirements.

Policies and Guidance

All staff are required to handle data in accordance with our Data Protection Policy. The Data Protection Policy ensures that we handle information in accordance with legislative requirements and good practice to safeguard individuals' rights.

Our terms and conditions of employment have been amended expressly to require employees to ensure they do not do anything which would cause AURES Technologies to risk being in breach of its data protection obligations towards its employees, customers or suppliers.

We are updating our Data Protection Policy and associated guidance to reflect the new requirements.

Customers

We are in the process of reviewing with our customers all our agreements to ensure compliance with the GDPR. The review will ensure that relevant wording is in place to cover aspects such as the duration, nature and purpose of the processing, the types of data processed and the obligations and rights of the controller. It will also, where applicable, cover cross border transfers and the use of any sub processors.

Suppliers

We are in the process of identifying suppliers who process personal data on behalf of us as our processor and we are in the process of seeking to update those contracts to incorporate the provisions for processor contracts required by Article 28 of the GDPR.

Information Security

We have a range of technological and procedural measures in place to mitigate the occurrence and impact of information security incidents, including accidental loss or destruction of, or damage to personal information. The measures are being kept under review.

Sub-Contracting and Data Transfers

In the case of transferring information to another member of our group of companies or any other party which is outside of European Economic Area, we will take steps to ensure that personal data is adequately protected in accordance with UK legal requirements. Where we are in a contractual relationship with the recipient, such protection will normally consist at minimum of appropriate contractual protections agreed between us and the recipient.

To ensure we deliver an exceptional level of service to our customers, we choose to outsource some of our services or engage contractors and others to support us (for example, maintenance services). In these cases, relevant personal data could be provided to and processed by the provider of such services, in accordance with the terms of our contract with them and to the extent appropriate for the performance of that contract. These arrangements are being reviewed and formal contractual mechanisms appropriate to the location of the recipient are being introduced to reflect the requirements of the GDPR.

Privacy by Design and Privacy Impact Assessments

We carry out risk assessments of data protection and information issues when purchasing or developing new products and services that relate to the processing of personal data.

Data Breaches

We have a process for handling data breaches. This is under review to ensure that when required, we are able to meet the new reporting obligations under GDPR. We would notify our customers as soon as reasonably practicable on becoming aware of a high-risk data breach which impacts them in accordance with applicable law.



TOUCH THE DIFFERENCE
Individuals' Rights

We are reviewing our established internal process for managing individuals' rights requests in light of the expanded rights of data subjects under GDPR and the reduced timeframe for complying with such requests.

Employees are being required to handle data in accordance with our new Data Protection Policy which includes guidance on how to recognise and respond to individuals exercising their rights under the GDPR.