

## GDPR

### Frequently Asked Questions

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10 July 2018

We are seeing more questions coming from both our suppliers and customers as all companies are performing due diligence around GDPR compliance. Below are the answers to the commonly asked questions:

#### **Where are your data and applications stored?**

All data is stored and processed within the EU

#### **Do you have a Data Protection Officer?**

Yes, we have retained the services of Athene Secure Ltd to operate as our Data Protection Officer. They can be contacted at [dpo@gradus.com](mailto:dpo@gradus.com). Any data subject requests such as a "Subject Access Request" can be routed through their service for actioning.

#### **In processing personal data, do you consider yourselves a "Controller" or a "Processor"?**

Gradus Limited is a Data Controller as defined in Article 4 Paragraph 7 of the regulation.

#### **Do you process any "Special Categories" of personal data?**

No, we do not process any "Special Categories" of personal data regarding either our customers or suppliers.

#### **What "Legal Basis" do you use for processing personal data?**

We use:

- "Legal Obligation" - in areas where we are legally obliged to process data (for example, keeping sales / transaction records for tax purposes)
- "Performance of a contract" – in relation to fulfilling our contractual obligations (for example, delivering goods or services, upholding warranty details for future claims)
- "Consent" – in relation to direct marketing activities
- "Legitimate Interest" – for general business communication (including marketing.)

#### **What measures do you have in place for ensuring appropriate security of personal data?**

We have utilised a risk-based analysis method to identify the appropriate type of controls to protect all personal data held. We have both technical and organisational measures in place controlling the confidentiality, integrity and availability of the data.

The controls in place are tested and reviewed on a regular basis to ensure they are still required, valid and functioning as expected.