

Harbar Ltd. Data Protection Policy

(Updated January 2019)

Introduction

The EU General Data Protection Regulation ("GDPR") came into force across the European Union on 25th May 2018 and brought with it significant changes to data protection law, that have been designed to meet the requirements of modern digital communications. The new Regulation aims to standardise data protection laws and processing across the EU, affording individuals stronger, more consistent rights to access and control their personal information.

Our Commitment

Harbar Ltd, and all its subsidiary companies, ('we' or 'us' or 'our') are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.

We are dedicated to safeguarding the personal information under our control and to developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

How We Prepared for the GDPR

Harbar Ltd, and all its subsidiary companies, became fully compliant with the GDPR on 25th May 2018.

Our preparation included: -

- Information Audit - carrying out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.
- Policies & Procedures - implementing new data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including: -
 - Data Protection – our main policy and procedure document for data protection has been overhauled to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities.
 - Data Retention & Erasure – we have updated our retention policy and schedule to ensure that we meet the 'data minimisation' and 'storage limitation' principles and that personal information is stored, archived and destroyed compliantly and ethically.
 - Data Breaches – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.
 - International Data Transfers & Third-Party Disclosures – where Harbar Ltd., and any of its subsidiary companies, stores or transfers personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. We carry out strict due diligence checks with all recipients of personal data to assess and verify that they have appropriate

- safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.
 - Subject Access Request (SAR) – we have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge.
- Legal Basis for Processing - reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
- Privacy Notice/Policy – revising our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- Obtaining Consent - revising our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.
- Direct Marketing - revising the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.
- Data Protection Impact Assessments (DPIA) – where we process personal information that is considered high risk, involves large scale processing or includes special category/criminal conviction data; developing stringent procedures and assessment templates for carrying out impact assessments that comply fully with the GDPR's Article 35 requirements.
- Processor Agreements – where we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Hosting etc), we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they (as well as we), meet and understand their/our GDPR obligations.
- Special Categories Data - where we obtain and process any special category information, we do so in complete compliance with the Article 9 requirements and have high-level encryptions and protections on all such data.

Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy to access information via our Head Office, of an individual's right to access any personal information that Harbar Ltd., and any of its subsidiary companies, processes about them and to request information about : -

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this

- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

Information Security & Technical and Organisational Measures

Harbar Ltd., and any of its subsidiary companies, takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures, including: -

GDPR Roles and Employees

Harbar Ltd., and any of its subsidiary companies, has designated Rodney Lamont as our Data Protection Officer (DPO), whose role is to develop and implement our roadmap for complying with the new data protection Regulation. The DPO is responsible for promoting awareness of the GDPR across the organisation, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures.

Harbar Ltd., and any of its subsidiary companies, understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR. We have implemented an employee training program specific to the GDPR, which will be provided to all employees, and forms part of our induction and annual training program.

If you have any questions about our preparation for the GDPR, please contact Rodney Lamont, our Data Protection Officer.