



VERSION 1  
MARCH 20, 2018

# RedefineIT

**GDPR PRIVACY PROCEDURE**  
POLICIES AND PROCEDURES FOR GDPR COMPLIANCE

## SCOPE

All processing of personal data by The Company is within the scope of this procedure.

## RESPONSIBILITIES

GDPR Owner is responsible for ensuring that the privacy notice(s) is correct and that mechanisms exist such as having the Privacy Notice(s) The Company Website to make all data subjects aware of the contents of this notice prior The Company commencing collection of their data.

All staff that need to collect personal data are required to follow this procedure.

For the purposes of this document Redefine IT shall be referred to as “The Company”.

## PROCEDURE

The Company shall identify the legal basis for processing personal data before any processing operations take place by clearly establishing, defining and documenting:

- The specific purpose of processing the personal data and the legal basis to process the data under:
  - Consent obtained from the data subject;
  - Contractual Obligations;
  - Legal Obligations;
  - Protection of the vital interests of the data subject, including the protection of rights and freedoms;
  - Official authority of The Company or to carry out the processing that is in the public interest;
  - Necessary for the legitimate interests of the data controller or third party, unless the processing is overridden by the vital interests, including rights and freedoms;
  - National law.
- Any special categories of personal data processed and the legal basis to process the data under:
  - Necessary for employment rights or obligations;
  - Protect the vital interests of the data subject, including the protection of rights and freedoms;
  - Necessary for the legitimate activities with appropriate safeguards;
  - Personal data made public by the data subject;
  - Legal claims;
  - Substantial public interest;

## PRIVACY NOTICES

Where Consent is the purpose for lawful collection of data.

The Company shall be transparent in its processing of personal data and provides the data subject with the following:

- The Company's identity, and contact details of the GDPR Owner.
- The legal basis and purpose for the intended processing of personal data.
- Where relevant, The Company's legitimate interests that provide the legal basis for the processing;
- Potential recipients of personal data;
- Any information regarding the intention to disclose personal data to third parties and whether it is transferred outside the EU. In such circumstances, The Company will provide information on the safeguards in place and how the data subject can also obtain a copy of these safeguards;
- Any information on website technologies used to collect personal data about the data subject;

All information shall be provided in a clear and easily accessible format.

The Company shall adhere to the Data Subjects rights in line with the GDPR.

When data is contractually required for processing

- The Company shall process data without consent in order to fulfil contractual obligations.

When personal data has been obtained from a source other than the data subject The Company shall make clear the source and types of information collected and will provide the Data Subject with:

- The name and contact details of the Data Controller and their GDPR Owner.
- The purpose(s), including legal basis, for the intended processing of personal data;
- Categories of personal data;
- Potential recipients of personal data;
- Any information regarding disclosing personal data to third parties and whether it is transferred outside the EU – Organisation Name will provide information on the safeguards in place and how the data subject can also obtain a copy of these safeguards;

The Company shall provide information to Data Subjects where necessary;

- Within one month of obtaining the personal data, in accordance with the specific circumstances of the processing;
- At the first instance of communicating in circumstances where the personal data is used to communicate with the data subject;
- When personal data is first disclosed in circumstances where the personal data is disclosed to another recipient.

The above does not apply:

- If the data subject already has the information;
- If the provision of the above information proves impossible or would involve an excessive effort;
- If obtaining or disclosure of personal data is expressly identified by Member State law; or
- If personal data must remain confidential subject to an obligation of professional secrecy regulated by Member State law, including a statutory obligation of secrecy.