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Newbery Metals Limited – Compliance Statement

The General Data Protection Regulation (GDPR) comes into force on 25 May 2018 and will automatically become law in all 28 Member States of the European Union (EU).

Preparation started in May 2017 for GDPR and as part of this process we have reviewed and updated where necessary our internal processes.

How We Prepared for the GDPR

Newbery Metals Limited already has a consistent level of data protection and security across our organisation; however it is our aim to be fully compliant with the GDPR as of **25 May 2018**. ***Our preparations 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.

Privacy Notice/Policy – we have revised our Privacy Notice 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.

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.

Policies & Procedures – we are implementing data protection policies and procedures to meet the requirements and standards of the GDPR.

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.

Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide any personal information that **Newbery Metals Limited** 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



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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

All our General Data Protection Regulation Policies are available in full on our website:

www.newberymetals.com

23 May 2018