

## ACTUS GDPR STATEMENT

As an ISO27001 accredited provider, many of our established processes already meet the needs of GDPR. We are monitoring the ICO guidelines proactively and are committed to being fully GDPR compliant when it comes into law on the 25<sup>th</sup> May 2018. This will include our technical and organisational security controls, customer and supplier contractual matters, internal processes, data flows and customer assurance activities. We will further assist our customers where possible to help them achieve their own GDPR compliance for systems operating on our infrastructure.

Data protection in the Actus™ Software is mainly about security, access and retention of data. In relation to the Actus application we are the data processor and the client is the data controller. We have many established security protocols in place which relate to data security which are already outlined in our security policy, some of them are particularly relevant to GDPR and are highlighted below.

### **Backups & Data retention:**

We back up client data hourly to our secure servers and data is retained for a month, after which point it is thoroughly deleted; the same applies to any data uploaded through our secure FTP site. We have introduced new controls to the Actus application that enable each client to control the duration that data within the live system is retained for, which supports them in achieving their own GDPR compliance.

### **Access:**

Data access is strictly controlled with stringent security measures in place around Physical and Environmental Security; HR Security and Datacentre compliance. There are also a number of enhanced security options available including 2-step authentication and whitelisting of IP addresses.

### **Encryption:**

At application level we already encrypt sensitive data and our configurable HR database allows companies to specify additional encryption of fields if required.

### **Obtaining Consent:**

Our contract and sign off process provides us with formal consent to remain in contact with our clients and prospective clients and we operate an opt in policy only for marketing.

We continue to monitor the guidance issued from the ICO and will update this statement and our processes as appropriate.

Signed by *Lucinda Carney*  
Lucinda Carney (Oct 31, 2020 20:16 GMT)  
On behalf of Advance Change Ltd, Chief Executive Officer

Date 10/31/2020