

## GDPR Response

for

Innovate Services Ltd.

(and member companies)

### Version History

Change Date	Author	Change	Next Review Date
02/05/2018	EbitConsultancy Ltd.	Initial Version	01/05/2019

## Innovate Services Ltd. GDPR Readiness Statement

### 1 Introduction

The European Union has taken a huge step towards protecting the fundamental right to privacy for every EU resident with the new General Data Protection Regulation (GDPR) which will be effective from May 25, 2018. In the UK, this will be supported by a new version of the Data Protection Act (currently in the consideration of amendments stage before receiving royal assent). This will keep the UK position in step with Europe even after 'Brexit'.

It means that EU residents will now have greater say over what, how, why, where, and when their personal data is used, processed, or disposed. This rule clarifies how the EU personal data laws apply even beyond the borders of the EU. Any organization that processes EU residents' personal data in any manner, irrespective of its location, has obligations to protect the data.

Innovate Services is well aware of its role in providing the right tools and processes to support its users and customers in meeting their GDPR obligations.

### 2 Innovate Services' Commitment

At Innovate Services, we have always honoured our users' right to data privacy and protection. We have never used parents' or children's details for marketing purposes and do not provide this information to anyone else for any purpose. We also recognise that our suppliers and contractors are a key part of our ability to provide our services and we put the same effort into protecting them as we do our customers and staff.

We have no necessity to collect and process any individual's personal information beyond what is required for the functioning of our products or the provision of our services.

Over the years, we have demonstrated our commitment to data privacy and protection by ensuring the technology and tools supporting our services have been implemented to the best data privacy and security standards, but we recognize that the GDPR will help us continue our objective to move towards the highest standards of operations in protecting customer data.

### 3 How is Innovate Services preparing for GDPR?

With responsibility for the safety and security of several hundred children, young people and their parents who are our customers and service users, we know that we cannot simply ignore or 'tick the boxes' for GDPR compliance.

As a data controller, Innovate Services understands that it is responsible for ensuring all of its staff, suppliers and service providers understand and actively embrace the ideas, spirit, principles and rights of GDPR. And not just in a way which ticks boxes, but which changes the way we manage individual's information and then drives the business forward.

As a data processor on behalf of our partners and customers, we understand our obligation to help them to prepare for their own GDPR compliance.

This is not something which can be completed overnight, nor does it end when we can say 'we are compliant'. This is why we have embarked on an ongoing journey to become compliant and maintain our compliance as the laws evolve.

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We have thoroughly analysed GDPR requirements and have put in place a dedicated internal team to drive our organisation to meet them. Some of our ongoing initiatives are:

- **Identifying personal data** – We have reviewed each of our business systems and processes to identify the different types of personal data we collect, use, store and dispose of. This audit has helped us to determine the roadmap we must follow.
- **Providing visibility and transparency** – One of the most important aspects of GDPR is about communicating how the collected data is used. As both a data controller and data processor, Innovate Services' key role is to provide clarity over what we collect, how we use it and why and we are pleased to say this is now available to everyone in our privacy policy.
- **Enhancing data integrity and security** – Data privacy and data security are both intimately related to and dependent upon each other. Analysis of our existing systems and processes indicated a number of areas where our already individual-focused security measures and processes could be further improved, and we are working towards this, both internally and with our suppliers. This is being reinforced with independent testing.
- **Children's information** – Being a supplier of services into an educational environment which interacts directly with children is both a privilege and at times, challenging. To provide our services, we need some means of being able to identify individual children to ensure they are provided with what they are entitled to, so in every case we work with the schools to ensure secure and robust integration with their own systems, security measures and controls and that any child specific information which we maintain is kept to an absolute minimum. Access to this information is strictly controlled and monitored, and as a result of our GDPR project, this has been reviewed and will be further improved through a series of additional contracts, processes, measures and controls which will ensure we provide end-to-end security across our systems. For Secondary Schools and Colleges we do not hold or store the personal data of students. All data is controlled and stored by the school. We can only access the relevant data to process a till transaction. For Primary Schools the only data we obtain about students is basic information inputted by parents or guardians when registering for use of the service. This data is not passed to any third parties except the school the child attends.
- **Breach handling process** - We take our obligations under GDPR seriously especially where breaches are concerned. We have created a Breach Handling process which enables us to manage when things go wrong in the correct manner – quickly and efficiently to minimise impact.
- **Subject Access Requests and other rights** – Following our earlier work, we have created a set of processes which enable us to handle any individual's choice to exercise their rights under GDPR (including any Subject Access Request). The details of how to start the process are clearly stated on our privacy policy.
- **Data Retention** – we have a clear definition of what information we have, what we use it for and how long we need it for and a process for destroying it when it is either no longer correct or required.
- **Data Protection Officer** – owing to the size of our business and the nature of the information we process and control, we now have a dedicated Data Protection Officer in Bryan Lygate. Bryan has been working with an external consultancy to help formulate our data privacy objectives and GDPR compliance plan and is working with senior management

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in our company to ensure we do the right things for compliance. You are able to contact Bryan Lygate at [bryan.lygate.dpo@innovatefood.co.uk](mailto:bryan.lygate.dpo@innovatefood.co.uk)

## 4 What does this mean for you?

We understand that meeting the GDPR requirements will take a lot of time and effort, both for us as a supplier and for you as our customer. But we want this to be as painless as possible.

In all cases, you can expect us to provide you with:

- updated contractual agreements detailing what you can expect from us (as data processor) and equally what we expect from you (as data controller);
- assistance to help you make appropriate changes to your own systems and processes – obviously though we can't do them for you, but we can talk to your suppliers to help them integrate their solutions with ours;
- details of what external organisations we use to process your information and how they themselves meet the GDPR obligations;
- regular communication from us regarding our work on our GDPR compliance journey.

## 5 What steps and measures should you have in place to work with Innovate Services LTD?

- You should create a data privacy team to oversee GDPR activities and raise awareness within your organisation.
- Review your current security and privacy processes in place and where applicable, revise your contracts with third parties and suppliers to meet the requirements of the GDPR.
- Identify the personal data that you collect, hold or otherwise process. Pay special care to any information about children and any special categories of personal data (like biometrics).
- Analyse how this information is being processed, stored, retained and deleted and whether processes can be improved to ensure it is better protected.
- Assess any third parties with whom you disclose or share data with (to understand how they are prepared for GDPR).
- Be transparent about your processing.
- Establish procedures to respond to data subjects when they want to exercise their rights.
- If the risk of processing (to the data subject) is sufficient, conduct a Data Protection Impact Assessment (DPIA)
- Create processes for data breach notification activities.
- Continuous employee awareness is vital to ensure continual compliance to the GDPR so make sure you educate your staff.