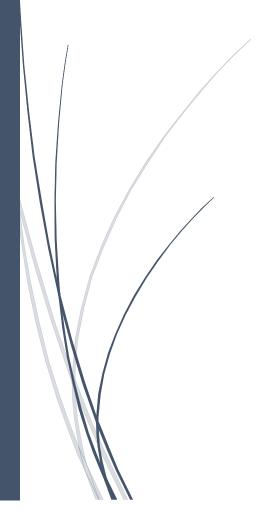


23/11/2021

UK GDPR Compliance Statement



Adrian Symons
PROTEX FASTENERS LTD



GDPR Compliance Statement

Protex Fasteners Ltd

The European Union has taken a huge step towards protecting the fundamental right to privacy for every resident within the new UK General Data Protection Regulation (UK GDPR) as this is after 31st December 2020 (after 'Brexit'). In the UK, this policy will still apply and the reviews with continue as part of our internal process.

This means that we have a greater say over what, how, why, where and when their personal data is used, processed, or disposed. This rule clarifies how the UK personal data laws apply even beyond the borders of the EU. Any organisation that works with EU residents' personal data in any manner, irrespective of location, has obligations to protect the data.

Protex Fasteners Ltd is aware of its role regarding compliance and in providing the right tools and processes to support its customers, suppliers, and staff in meeting their UK GDPR obligations.

Protex Fasteners Ltd Commitment

Protex Fasteners Ltd, will always honour our customers right to data privacy and protection. Protex Fasteners Ltd will only collect and hold the information we need; We may use your details for marketing purposes with your consent and we do not provide this information to anyone else for any reasons. We also recognise that our suppliers are a key part of our members and we put the same effort into protecting them as we do our customers, and staff.

We continue to demonstrate 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 recognise that the UK GDPR will help us move towards the highest standards of operations in protecting customer data.

As a data controller, Protex Fasteners Ltd understands that it is responsible for ensuring all its staff, suppliers and service providers understand and actively embrace the ideas and intentions, principles, and rights of UK 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 towards.

From our customers perspective, we understand our obligation to help them prepare for their own UK GDPR compliance and to ensure our behaviour and systems meet their contractual needs.

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



We have thoroughly analysed UK GDPR requirements and have put in place a dedicated internal team to drive our company 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 has helped us to determine the road map we must follow and has also given us the insight to be able to further help our customers with doing the same.
- Providing visibility and transparency one of the most important aspects of UK GDPR is about communicating how the collected data is used. As both a data controller and data processor, our 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 several areas where our individual-focused security measures and processes could be further improved, and we are working towards this, both internally and with our suppliers, and we are reinforcing this with independent testing.
- Breach Handling process We know that no-one wants to have to own up to a mistake, but
 we take our obligations under UK GDPR (known as Subject Access Requests'). The details of
 how to start the process are now clearly stated on our privacy policy.
- Data retention we now have a clear definition of what the 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. Where we need to retain commercial or manufacturing
 information but not that of the individuals involved, we would use tools which can
 anonymise the individual data allowing us to maintain our commercial obligations without
 infringing on individual rights.
- Data Protection Officer owing to the size of our business and the nature of the information we process and control, we do not need a dedicated Data Protection Officer (DPO), but we are proud to say that Sally Cooke will act as our named contact.
- Contract Reviews we have been reviewing our contracts with all our suppliers and subcontractors to ensure they are suitably compliant with UK GDPR and working with them to ensure their compliant.



Overview

Protex Fasteners Ltd understand that meeting the UK GDPR requirements will take a lot of time and effort, both for us as a responsible supplier and for you as our member or customer.

We have a duty to keep you updated if there is a change in any legislation.

Version 2.0

Authorising Contact:

Name:	Adrian Symons
Signature:	A. Spros
Position:	IT Manager

Date: 23rd November 2021