

## GDPR Compliance Statement and Privacy Policy

### Introduction

The **EU General Data Protection Regulation (“GDPR”)** come into force across the European Union on 25<sup>th</sup> May 2018. **Talis Karklins Limited** (‘we’ or ‘us’ or ‘our’) are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. **Talis Karklins Limited** are dedicated to safeguarding the personal information.

### Data controller

Talis Karklins Limited (a limited liability company registered in England and Wales with number 9196806 with a registered address of 10 Grove Road, London, TW89NT, UK) is registered as a data controller under registration number ZA111933.

### Personal data security

We have policies, procedures and training in place in respect of data protection, confidentiality and information security. We regularly review such measures with the objective of ensuring their continuing effectiveness.

Our data protection policies and procedures meet the requirements and standards of the GDPR and any relevant data protection laws, including:

- **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; with a dedicated focus on privacy by design and the rights of individuals.
- **Data Retention & Erasure** – we have updated our retention policy and schedule to ensure that we meet the ‘*data minimisation*’ and ‘*storage limitation*’ principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new ‘*Right to Erasure*’ obligation and are aware of when this and other data subject’s rights apply; along with any exemptions, response timeframes and notification responsibilities.
- **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.
- **International Data Transfers & Third-Party Disclosures** – where **Talis Karklins Limited** stores or transfers personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include a continual review of the countries with sufficient adequacy decisions, as well as provisions for binding corporate rules; standard data protection clauses or approved codes of conduct for those countries without. We carry out strict due diligence checks with all recipients of personal data to assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.
- **Subject Access Request (SAR)** – we have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge. Our new procedures detail how to verify the data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.

- **Legal Basis for Processing** - we are reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
- **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.

We will only share personal data with third parties where we are legally permitted to do so. We do not provide information to third parties for their own marketing purposes and we do not undertake mailings for third parties. Where we transfer personal data to third parties, we will put in place appropriate contractual arrangements and seek to ensure that there are appropriate technical and organisational measures in place to protect personal data.

We may provide personal data to:

- Third parties involved in the performance of services, such as providers of cloud-based software, IT systems, data processing or functionality, security, archiving storage, marketing and payment services
  - Auditors and advisers – we may transfer personal data to our auditors and advisers as required by law or as reasonably required in the management of our business.
  - Third parties where required by applicable law and regulation – we may be requested or compelled to disclose personal data to third parties such as regulators and law enforcement agencies. We will only provide personal data to such parties where there is a legal requirement or permission to do so.
- **Obtaining Consent** - we have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.
  - **Direct Marketing** - we have revised the processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.
  - **Processor Agreements** – where we use any third-party to process personal information on our behalf we have drafted due diligence procedures for ensuring that they (*as well as we*), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organisational measures in place and compliance with the GDPR.
  - **Special Categories Data** - where we obtain and process any special category information, we do so in complete compliance with the Article 9 requirements and have high-level encryptions and protections on all such data. Special category data is only processed where necessary and is only processed where we have first identified the appropriate Article 9(2) basis or the Data Protection Bill Schedule 1 condition. Where we rely on consent for processing, this is explicit and is verified by a signature, with the right to modify or remove consent being clearly signposted.

## **Cookies information**

Cookies are small text files that are placed on your computer by the websites that you visit. Cookies are widely used in order to make websites work more efficiently and to provide information to the owners of the site. The use of cookies is now standard for most websites. However, you can reset your browser to refuse any cookie or to alert you to when a cookie is being sent. You can control cookies stored on your hard drive through the web browser settings. To find out more about cookies, including how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

**We only use cookies to monitor the performance of our website and to improve user experience**

**Cookies used by Talis Karklins Limited website**

<b>Cookie type</b>	<b>Name</b>	<b>Purpose</b>
Google analytics	UTMA UTMB UTMC UTMZ GID GAT GA	These cookies are used to monitor the performance of our site, how effective our marketing campaigns are and enhance your online experiences. The cookies collect information in an anonymous form, including the number of visits to our site, where visitors have come from to the site and the pages they visited. To find out how to opt out of being tracked by Google Analytics across all websites visit  <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a> .
Advertising Cookies <b>google.com</b>	APISID SSID PREF SID SAPISID HSID NID	These cookies are used to make advertising messages more relevant to you and your interests. These advertisements are solely intended to make you aware of relevant promotions. Talis Karklins Limited not sell your data to any third parties, please see details of our privacy policy above.
<b>google.co.uk</b>	SAPISID HSID SID PREF SSID APISID	

## **Data Subject Rights**

You have rights in relation to any of your personal data held by us as a data controller. Should you wish to exercise your rights right, please contact our Data Protection Officer via email at [tk@tkaudit.london](mailto:tk@tkaudit.london).

You have a right to request:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- 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

## **Information Security & Technical and Organisational Measures**

Talis Karklins Limited takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures.

If you have any questions about this Compliance Statement, you can contact our Data Protection Officer via email at [tk@tkaudit.london](mailto:tk@tkaudit.london)