



GDPR COMPLIANCE POLICY

4/5/2018

EU General Data Protection Regulation (GDPR) comes into force on 25 May 2018 with respect to how organisations manage and process personal data. It will supersede the 1998 Data Protection Act (DPA). Dynamic Fieldwork Ltd is committed to and will comply with applicable GDPR regulations when they take effect in May 2018, protecting and manage personal data in accordance with accepted standards. Dynamic Fieldwork will work closely with our clients and partners to meet contractual obligations for all services.

The following framework will enable Dynamic Fieldwork Ltd to prepare and adhere to the principles which are fundamental to adhere to General Data Protection Regulation:

Awareness

All decision makers and key people in Dynamic Fieldwork are fully aware that law is changing to the GDPR and will understand their responsibilities with respect to Data protection.

Documentation

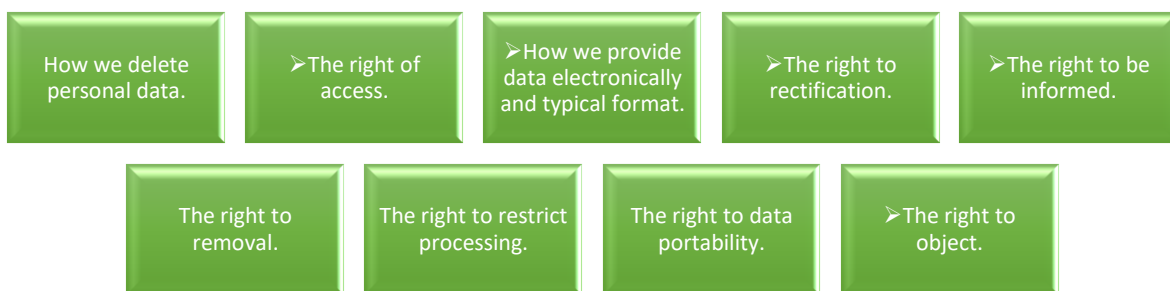
All information with personal data will be documented i.e. demonstrating where it came from and whom we share it with. We keep records of our processing activities and have effective policies and procedures in place.

Communicating privacy information.

If Dynamic Fieldwork collect personal data certain information such as respondent identity and how we intend to use their information and the lawful basis for processing the data will be clearly communicated. All data retention periods will be revealed and that individuals have a right to see any personal information in a concise, easy to understand and clear language.

Individuals' rights

At Dynamic Fieldwork Procedures exist to cover all respondents/individual's rights. Procedures will cover the following:



Designated personnel at Dynamic Fieldwork will perform necessary action e.g. to locate and delete data.

Subject access requests

All procedures are updated to ensure requests are compliant with GDPR. Dynamic Fieldwork will not charge for complying with any request (within reason). All requests will be complied to within 30 days. If in any unique circumstance that we must refuse a request the reason doing so will be clearly outlined to the individual and necessary appeal details provided.

Lawful

Dynamic Fieldwork will identify the lawful basis for processing data under GDPR, documented in our Privacy notice. Dynamic Fieldwork is cognisant of the fact that individuals will have a stronger right to have their data deleted where consent is used as a legal basis for data processing. This will be updated in our Privacy notice to explain your lawful basis and/or in response to a subject access request.



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Consent

Consent for any Dynamic Fieldwork related processing activity will be freely given, specific, informed and unambiguous. There will be a positive opt-in as consent will not be inferred from silence, pre-ticked boxes or inactivity. We will also have a simple option for people to withdraw consent. Any processing activities Dynamic Fieldwork undertakes whereby we rely on individuals' consent to process their data, will meet the GDPR standard on clarity, specifics, ability to opt in and more importantly opt out.

Children

Dynamic Fieldwork activities typically don't involve children in their data processing activities. However, if the need arises systems will be in place to verify individuals' ages and/or obtain parental or guardian consent for any data processing activity. If we need a parent or guardian's consent to process children's personal data lawfully, Dynamic Fieldwork will follow the GDPR guidance which sets the age when a child can give their own consent to this processing at 16 (*at time of writing this may be lowered to age 13 in the UK).

Data breaches

Dynamic Fieldwork will notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals. Coupled with this we will also have to notify those individuals concerned directly in most cases. We have procedures in place to effectively detect, report and investigate a personal data breach. If for any reason we cannot fully address any breach Dynamic Fieldwork will consult the ICO to seek its opinion as to whether the processing operation complies with the GDPR.

Data Protection Officers

Dynamic Fieldwork have appointed a designated Data Protection officer that will take responsibility for data protection compliance, thus ensuring all individuals are familiar with and adhere to GDPR standards and employ best practices with respect to Personal Identifiable Information (PII) in particular. The Data Protection officer will have ultimate



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responsibility for data protection compliance and the Board will ensure they have the requisite knowledge, support and authority to carry out their role effectively.

International

Dynamic Fieldworks 'main establishment' is in the UK. Any data processing activities which substantially affects individuals in other EU states is carried out from the UK. This is where our 'lead supervisory authority' is based.