

GDPR Policy Document

The General Data Protection Regulation (GDPR) seeks to harmonise data protection measures across the EU. It also introduces significant penalties for data breaches. The GDPR effective date is 25th May 2018. In the UK, the Data Protection Bill will, once law, enact the GDPR regulatory regime and will replace the Data Protection Act 1998.

Riverdale Paper PLC values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the company's staff, as well as others acting on the company's behalf, is key to maintaining these standards.

The Policy applies strictly to all employees, Directors, agents, consultants, contractors and to any other people or bodies associated with Riverdale Paper PLC.

This GDPR Policy sets out Riverdale Paper PLC's commitment to ensuring compliance with the GDPR Regulations and the Data Protection Bill, both in respect of internal data as a Data Controller and, on behalf of its customers, as a Data Processor.

[i] Obligations as a Controller

Riverdale Paper PLC will:

- ensure compliance with the Data Protection Principles under the Data Protection Act [Articles 5 & 6 of GDPR]
- undertake Impact Assessments [Article 35] as applicable, and where there may be a high risk to Data Subjects due to new operational processes or to the scale of the proposed data processing
- implement appropriate technical and organisational measures to ensure and demonstrate that its processing activities are compliant with the requirements of the GDPR. Such measures to include continued membership of the United Kingdom Shredding Association [UKSSA], and accreditation to the ISO9001 quality management standard. [Article 24]
- as required by Article 32 of the GDPR, and as applicable to Riverdale Paper PLC as data Controller, implement measures to ensure; encryption of personal data; on-going reviews of security measures; provision of redundancy and back-up facilities; regular security testing
- Ensure compliance with Data Protection law is integrated into planning and implementation of new processing activities [Article 25]
- give effect to the rights of Data Subjects
- appoint a third-party processor only on the basis of a binding agreement, and where the third party guarantees compliance with the GDPR [Article 28].
- Keep a record of its processing activities, as detailed below [Article 30 [1]]
- co-operate, as required, with the Information Commissioner's Office [ICO]
- report a data breach to the [ICO] without undue delay, and in any event within 72 hours of verification of such a breach. Where a data breach is likely to result in harm to a Data

Subject(s), notify the affected Data Subjects of such a breach without undue delay, and in compliance with the GDPR requirements in terms of such notification [Article 34]

Article 30 [1] Records of Processing Activities as a Controller

- As a Controller of personal data, and in relation to the control of that Data which falls under its responsibility, document all applicable information under Article 30 of the GDPR [Records of processing activities] Sub-section [1] Controller.

Such documentation will include details of:

- the Controller
 - Controller's representative
 - the nominated Data Protection Officer
 - the purposes of the processing
 - categories of Data Subjects and Personal Data
 - the categories of recipients to whom the Data have been or will be disclosed [incl. recipients in third countries or international organisations]
 - time-limits for erasure of the different categories of data
 - general description of the technical and organisational security measures referred to in Article 32 (1)
- Codified Data Controller information will be recorded on Form [.....] of Riverdale Paper PLC's ISO9001 accredited Quality Management System

[ii] Obligations as a Processor

Riverdale Paper PLC will:

- Only act on the Controller's documented instructions [Article 28], on the basis of a contract or other legal act under Member State law
- Impose confidentiality obligations on all personnel who process the relevant data [Article 28]
- will not engage another processor ['sub-processor] without prior specific or general written authorisation of the Controller [Article 28]
- will, when engaging a sub-processor, set out in a contract or other legal act, data protection obligations on the sub-processor such that they implement technical and organisational measures in such a manner that the processing will comply with the GDPR
- utilise only those sub-processors demonstrating continued membership of the United Kingdom Security Shredding Association [UKSSA], and accreditation to the ISO9001 quality management standard. [Article 24]
- implement measures to assist the Controller in complying with the rights of Data Subjects
- at the choice of the Controller, delete or return all personal data to the Controller at the end of the provision of services relating to the processing

- immediately inform the Controller in the event that the Controller's instructions conflict with the requirements of the GDPR or other EU or Member State laws
- keep a record of its processing activities, as detailed below **[Article 30 [2]]**
- cooperate, as required, with the Information Commissioner's Office [ICO]
- conduct on-going reviews of security measures
- as required by Article 32 of the GDPR, and as applicable to Riverdale Paper PLC as data Processor in the context of the contract with the data Controller, implement measures to ensure: encryption of personal data; on-going reviews of security measures; provision of redundancy and back-up facilities; regular security testing
- report a data breach to the [ICO] without undue delay, and in any event within 72 hours of verification of such a breach. Where a data breach is likely to result in harm to a Data Subject(s), notify the affected Data Subjects of such a breach without undue delay, and in compliance with the GDPR requirements in terms of such notification [Article 34]
- As a processor sensitive personal data on a large scale, appoint a Data Protection Officer [Article 37]

Article 30 [2] Records of processing activities as a Processor

As a Processor of personal data, and in relation to the processing of that Data which falls under its responsibility, document all applicable information under Article 30 of the GDPR [Records of processing activities] Sub-section [2] Processor.

Such documentation will include details of:

- the name and contact details of the processor
- the name and contact details of the Controller on behalf of which the processor is acting
- the name of the controller and processor's representative (as applicable)
- the name of the Data Protection Officer
- the categories of processing carried out on behalf of each Controller
- a record of any transfer to any third country or international organisation
- general description of the technical and organisational security measures referred to in Article 32 (1)
- Codified Data Processor information will be recorded on Form [.....] of Riverdale Paper PLC's ISO9001 accredited Quality Management System

This GDPR Policy document will be implemented from 25th May 2018. It will be adapted and developed as necessary to ensure full compliance with the GDPR.

Where the measures contained in this Policy document conflict with or enhance those protections detailed in Riverdale Paper's existing 'Data Protection and Information Governance Policy', this GDPR Policy will prevail.

Riverdale Paper's existing Data Protection and Information Governance Policy will be rescinded from the company's Quality Management System on enactment of the UK Data Protection Bill 2018.

The company will investigate thoroughly any actual or suspected breach of this Policy, or a breach of the spirit of this Policy. Employees found in breach may be subject to disciplinary action.

Signed: 

Date: May 2020

Next Review Date: May 2021

This Policy will be reviewed annually or where significant changes occur to the GDPR, or the measures adopted by Riverdale Paper PLC in its implementation, to ensure its continuing suitability, adequacy and effectiveness. The review will be carried out by the Management Representative in conjunction with the appointed Data Protection Officer (as applicable), and the date of the last review recorded.