

ConSol Partners – GDPR Compliance Summary

Client Statement

January 2018

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Introduction

This statement has been prepared in order to summarize and inform ConSol Partner’s clients on the new EU General Data Protection Regulation (GDPR) legislation which comes into effect on 25th May 2018, how it impacts our business and what ConSol Partners are doing to prepare for this to ensure compliance.

What is GDPR and how does it impact ConSol Partners?

The EU's General Data Protection Regulation (GDPR) is the result of four years of work by the EU to bring data protection legislation into line with new, previously unforeseen ways that data is now used.

Currently, the UK relies on the Data Protection Act 1998, which was enacted following the 1995 EU Data Protection Directive, but this will be superseded by the new legislation. It introduces tougher fines for non-compliance and breaches, and gives people more say over what companies can do with their personal data. It also makes data protection rules more or less identical throughout the EU.

In essence, GDPR is about enhancing the protection of people, through better control of their personal data.

The key GDPR differentiators over the current 1998 Data Protection Act are that it calls for:

- Greater **Transparency** of what companies are doing with an individual’s personal data
- Increased **Accountability** of behaviour around personal data, including more demonstrable evidence of how companies use personal data and comply with the legislation.

“**Personal Data**” is defined as:

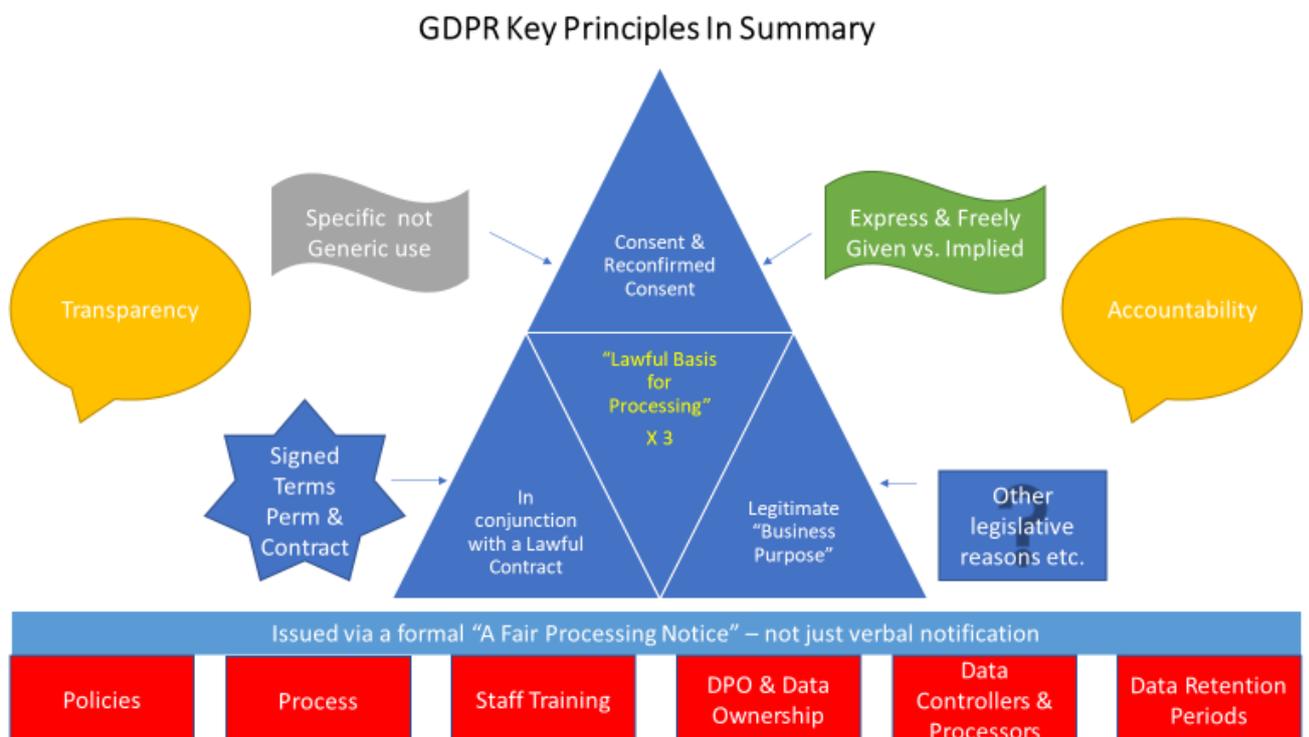
“Data which relates to a living individual who can be identified –

(a) from that data, or

(b) from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.”

Source: <https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

ConSol Partners hold, or process personal data on behalf of our employees, our candidates and occasionally on behalf of our client contacts also. We have summarised our understanding of what GDPR means for our business in a single graphic:



Empresaria Group position & compliance project

ConSol Partners are part of the Empresaria Group of companies. Empresaria are listed on the AIM in London and as such have a duty to both their shareholders and the Stock Exchange to drive legislative compliance through their operating companies.

As such, Empresaria Group Legal have taken a leading role in ensuring that the importance of GDPR compliance is fully understood and ensuring that ConSol Partners, along with our sister group companies are taking a structured approach to driving this compliance, before the legislation comes into force.

This lead has taken the form of:

1. Understanding the legislation as drafted
2. Interpreting what this means for the recruitment industry as a whole
3. Initiating a group wide project and walking each operating company through the following steps & high-level action plan:
 - Issue of Information Request from Group
 - Complete and return IR to Group by deadline
 - Information Request deadline for queries
 - Respond to queries
 - Data & response analysis conducted
 - Identify compliance measures required
 - Plan compliance steps
 - Draft compliance documentation*
 - Update meeting with each operating company
 - Address meeting outcomes & actions
 - Meet UK data reps to discuss implementation & business specifics
 - Address specific contracts with additional highlighted compliance risks
 - Implementation of documentation & staff training
 - Due diligence on progress
 - Identify remedial steps / plan remedial action
 - Plan and implement remedial action
 - Implement, observe and adjust remedial measures
 - GDPR goes live 25/05/18
 - Ongoing monitoring and risk assessment
4. *The compliance documentation set includes but is not limited to:
 - Data Processing Register (as controller and processor)
 - Candidate fair processing notice
 - Staff fair processing policy
 - Candidate leads (LinkedIn etc) consent request

- Consent to process sensitive personal data
- Lawful processing grounds (internal reference)
- Data lifecycle document (internal)
- Privacy and Cookie Policy (as applicable)
- DSAR Process
- Data Processing Contract (Subcontractors)

ConSol Partners current status & action plan

ConSol Partners are currently working through our compliance program as directed by Empresia and responding to individual requests for information with regards our GDPR readiness as they are received.

Staff awareness is being built upon week by week and our IT systems and partners appraised of what is required with regards best practise and retention and archiving behaviours

We have completed our process GAP analysis and are currently working through our documentation set and drafting as required. Staff training will commence in Q1 2018 with regards process and procedures and all registers of data controllers and processors (both internal and external) are being completed currently.

Our target is to be ready and have completed the program by Easter 2018, but this gives us some contingency should we need it before 25th May 2018.

Useful GDPR links & sources

The following links are not formally recommended, nor endorsed by ConSol Partners, but have proved to be useful sources with regards supporting further contextual understanding of GDPR and its implications:

Information Commissioner's Office Website:

<https://ico.org.uk/for-organisations/data-protection-reform/>

GDPR Awareness Coalition:

<http://gdprcoalition.ie/>

The Cloud Lawyer

<https://thecloudlawyer.net/>

Requests for further information

Should you require any further information with regards GDPR as it relates to your relationship with ConSol Partners, please contact your ConSol Account Team or email us at:

contact@consolpartners.com

or write to us at:

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