



COMPLIANCE STATEMENT

February 2022

Our Commitment

We are committed to ensuring protection of all personal information that we hold, and to provide and to protect all such data. We recognise our obligations in updating and expanding this program to meet the requirements of GDPR.

We are dedicated to safeguarding the personal information under our control and in maintaining a system that meets our obligations under the new regulations. Our practice is summarised below.

We already have a consistent level of data protection and security across our organisation, but we have introduced new measures to ensure compliancy.

Information Audit

We carried out an audit of information previously held and ensured that it was compliant with the new regulations. This audit will be formally checked with any new law changes or annually.

Policies and Procedures

We have revised data protection policies and procedures to 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 meets the standards and requirements of GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities.

- Data Retention and 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 in accordance with our obligations. We have procedures in place to meet the new "Right to Erasure" obligation. We have a dedicated Data Officer, dataofficer@vsy.biz that will support all GDPR requirements including Subject Access Request (SAR).

- Data Breaches

Our procedures ensure that we have safeguards in place to identify, assess, investigate and report any personal data breach as early as possible. Our procedures have been explained all employees.

- Privacy Notice/Policy

We have revised our Privacy Notice(s) to comply with 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.

- Obtaining Consent

We have reviewed 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.

GDPR Roles and Employees

We have a designated Data Officer and have appointed a data privacy team to develop and implement our roadmap for complying with the new data protection regulation. The team are responsible for promoting awareness of GDPR across the organisation, assessing our GDPR compliance, identifying any gap areas and implementing the new policies, procedures and measures.

We understand that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans.

If you have any questions about our GDPR compliance policies, require copies or have any questions, please contact our Data Officer at dataofficer@vsvy.biz.

Victor Stationery