

COMMA PARTNERS - GDPR-READINESS 2018

What steps has Comma Partners been taking to become GDPR-ready?

In advance of the “go live” date for GDPR on 25 May 2018, Comma Partners has been examining its data protection procedures and GDPR-readiness. Comma Partners is carrying out a formal review of the data we store, process, collect and control to ensure that all personal data is handled in accordance with the GDPR. Following on from that, we are reviewing internal procedures and policies to achieve ongoing compliance. This includes:

- External Policies: privacy policies, information security standards for third party suppliers;
- Internal Policies: data protection policy, IT policies, data retention and deletion policy and Human Resources recruitment, on-boarding and exiting procedures;
- Supplier Compliance: wherever Comma Partners uses subcontractors that have access to personal data, we seek to put in place data sharing agreements designed to comply with data protection law. We are currently reviewing this process and are looking to enhance these procedures;
- Client Contracts: If necessary, we will update the terms of service for our clients in order to ensure they are fully data protection compliant.

Does Comma Partners transfer any personal data outside the EU?

Comma Partners predominantly stores data in the EU. Where data may be transferred outside the EU, we are implementing appropriate safeguards, such as the standard contractual clauses (SCC), to achieve compliance with the GDPR.

IT Security

Comma Partners takes IT security very seriously and will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of personal information.

Insurance

Comma Partners maintains appropriate insurance to mitigate breaches experienced directly by Comma Partners (whether deliberate or accidental), including coverage of disaster recovery management and return to operation in the event of a security breach.