

## GDPR Compliance Statement

### Commitment

Flexicare (Group) Limited is committed to the principles inherent in the GDPR and particularly to the concepts of privacy by design, the right to be forgotten, consent and a risk-based approach. In addition, we aim to ensure:

- transparency with regard to the use of data
- that any processing is lawful, fair, transparent and necessary for a specific purpose
- that data is accurate, kept up to date and removed when no longer necessary
- that data is kept safely and securely.

### Staffing

Our appointed data protection persons are Eirwen Hughes and Marc Davies. They work to promote awareness of the GDPR throughout the company and to oversee the company's commitment to best practice. They will inform and advise the company and monitor its compliance.

### Policy

Our data protection policy is available on our website and a copy has been made available to all employees and to contractors and suppliers associated with this company. It forms part of the induction training of all new staff and follow-up sessions will be put in place if the legislation changes or further guidance is available.

### Right to be forgotten

Flexicare (Group) Limited recognises the right to erasure, also known as the right to be forgotten, laid down in the GDPR. Individuals should contact Eirwen Hughes or Marc Davies with requests for the deletion or removal of personal data. These will be acted on provided there is no compelling reason for continued processing and that the exemptions set out in the GDPR do not apply. These exemptions include where the personal data is processed for the exercise or defence of legal claims and to comply with a legal obligation for the performance of a public interest task or exercise of official authority.

### Subject access requests

Flexicare (Group) Limited recognises that individuals have the right to access their personal data and supplementary information and will comply with the one month timeframe for responses set down in the GDPR. As a general rule, a copy of the requested information will be provided free of charge although Flexicare (Group) Limited reserves the right to charge a "reasonable fee" when a request is manifestly unfounded or excessive, particularly if it is repetitive. If this proves necessary, the person concerned will be informed of their right to contest our decision with the supervisory authority (the Information Commissioner's Office (ICO)).

As set out in the GDPR, any fee will be notified in advance and will be based on the administrative cost of providing the information.

### Privacy

Flexicare (Group) Limited will implement data protection "by design and by default", as required by the GDPR. Safeguards will be built into products and services from the earliest stage of development and privacy-friendly default settings will be the norm. The privacy notice, which is on our website and which is provided to anyone from whom we collect data, explains our lawful basis for processing the data and gives the data retention periods. It makes clear that individuals have a right to complain to the ICO. Flexicare (Group) Limited has conducted a privacy impact assessment (PIA) to ensure that privacy risks have been properly considered and addressed.

### Data transfers outside the EU

Flexicare (Group) Limited does not transfer personal data outside the EU.

### Children

The GDPR provides for special protection for children's personal data and Flexicare (Group) Limited will comply with the requirement to obtain parental or guardian consent for any data processing activity involving anyone under the age of 16. Systems have been introduced to verify individuals' ages.

### Data loss

If a data breach occurs that is likely to result in a risk to the rights and freedoms of individuals, the people affected will be informed as soon as possible and the ICO will be notified within 72 hours.

### GDPR contact

Any questions related to GDPR or to issues concerning data protection generally should initially be sent to [GDPR@flexicare.com](mailto:GDPR@flexicare.com).