

# GDPR Compliance Statement

The EU Data Protection Regulation (GDPR) came into effect on May 25<sup>th</sup> 2018 and replaced the existing EU Data Protection Directive.

The GDPR establishes rules and regulations that relate to the protection, retention, transfer, and processing of the personal data for all residents of the EU. The GDPR will affect any company that conducts business in the EU, even if that company is itself located outside of the EU. The GDPR introduces new responsibilities, including the need to be able to demonstrate compliance and the ability to prove that consent has been obtained to process personal data.

PCL recognises that compliance is a shared responsibility: PCL and our clients are jointly responsible for implementing appropriate measures to ensure and be able to demonstrate that processing of personal data is carried out in full accordance with the new regulation.

Each party, Data Controller (Client) and Data Processor (PCL), alike must be able to demonstrate that the individual has consented to the use and processing of their data, prior to any processing being undertaken.

PCL is committed to maintaining active improvements to the overall security of our systems through ongoing improvements and consistent monitoring, compliant to the GDPR.

## Data Storage and Processing Facilities

PCL stores and processes data in the UK with the following provider:

- Rackspace UK, who are ISO/IEC 27001 certified and complaint.

## Data Security

PCL will operate and maintain technical and operational measures to protect against the accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access of Customer Data. PCL data, which includes assessment data (including item responses), is stored in an industry standard secure database. Access to this data is strictly controlled by PCL.

## Unauthorised Access

In the event of PCL becoming aware of a security breach, PCL will investigate the matter and notify the applicable parties within 72 hours. An investigation will begin without delay to determine the scope of the breach, identify individuals affected, identify the cause of the breach and restore integrity to our server and service.

## Data Transfer

Sometimes, in accordance with our contractual obligations to our clients (and detailed in the PCL Data Processing Addendum), personal data may be transferred to our Sub-Processors. The EU Commission has recognised Canada (commercial organisations) and United States of America (commercial organisations within the Privacy Shield Framework) as countries providing an adequate level of data protection. As such, personal data can be transferred from the EU to a recognised country without further safeguards being required.

PCL transfers data between Hogan Assessments Systems in the United States of America and Multi-Health Systems in Canada where appropriate. Further details can be found in the PCL Data Processing Addendum.

## Personal Data

PCL have assessed where and how its services, commercial websites and business systems collect and store (and dispose of) personal data. Our policies and documentation have been updated accordingly and PCL can confidently locate personal and transactional data. Personal data is also appropriately administered in response to requests for deletion, amendment, transfer or restriction of processing.

PCL's enhanced Informed Consent Policy will ensure that assessment candidates are fully aware of what personal data will be stored and processed, how PCL will use it, and, if applicable, when and where data transfer will take place.

## Third Party Access to Data

At no time will personal information or customer data be sold or provided to any outside parties (except to our authorised sub-processors as set out in client contracts and the PCL Data Processing Addendum). PCL holds all information collected in the strictest confidence and takes active measures to protect all data.

*For any further details, please contact PCL either via email at [info@psychological-consultancy.com](mailto:info@psychological-consultancy.com) or via telephone on +44 1892 559 540*