

Gamma Group Data Protection Policy

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Introduction

Data is an asset that allows technology companies such as Gamma to act. Data may relate to marketing forecasts, customer information, product usage statistics, technical designs and configurations, financial information, employee information or network availability metrics.

Gamma considers data protection to be a vital part of its internal controls and aims to implement relevant controls at the most appropriate level. With the intention to ensure data is available to those who need it, when they need it, to deliver against our objectives. Whilst also ensuring those who do not need access are not able to use it inappropriately.

Audience

All Gamma Group employees

Aims and goals

The aim of this policy is to ensure Gamma manages data we are responsible for in a consistent, legal, and appropriate way.

Our goals are to ensure Gamma data is:

- a. Managed, processed and consumed in such a way as to ensure all data, not only personal data, is used correctly and in line with our risk tolerance.
- b. Protected in line with relevant, local regulation and legislation.
- c. Protected in line with contractual obligations.

Scope

All data Gamma Group is responsible for

Policy statements

- a. Gamma will endeavour to make data available to Gamma employees who need it to be successful in their role.
- b. Data will be protected consistently, based on a classification applied and potential risks faced.
- c. Personal data, and sensitive personal data, will be managed in line with local legislation.
- d. Gamma will be transparent with its customers regarding how their data is stored and processed, subject to any applicable local legal/security restrictions.
- e. Gamma will risk assess third parties who have access to data Gamma is responsible for.
- f. Whenever possible data protection controls will be systemised to ensure they are consistent and easily enforced by employees.
- g. Gamma will ensure appropriate resources are made available to data protection and governance activities.

Education & Training

Training will be role specific and managed through various learning and development initiatives.

Roles and responsibilities

Each Group subsidiary will have access to Data Protection Officer. They are responsible for representing the data protection interests of natural persons impacted by the relevant company and compliance with local personal data laws.

Each subsidiary will ensure appropriate resources are aligned to data protection activities, ensuring central reporting activity is completed as required.

The Group Risk team will ensure appropriate processes are in place to risk assess suppliers and third parties.

The Group Technical Security team are responsible for outlining appropriate operational data protection controls.

The Group Architecture Review Board will ensure data protection is considered in all relevant review activity.

The Group Business Continuity team will ensure data is considered during business impact analysis activities.

Data owners will enforce the appropriate controls to ensure data is available and protected.

The Technology and Operations teams, who manage systems housing data, are responsible for the implementation of relevant data protection controls.

All managers and employees are responsible for the appropriate control of data they manage on a day-to-day basis.

Governance and reporting

Each country will have a local Data Protection Committee to drive risk reduction and data protection activities.

Local Data Protection Committee will report, on a quarterly basis, to the Gamma Group Data Protection Committee.

The output of the Gamma Group Data Protection Committee will be reported to the Group Risk Committee.

Data protection risks will be managed through the Gamma Group Risk Management Process.

Regulatory reporting will be managed in line with local regulatory and legal reporting processes.

Data incidents must be reported via the Security Incident Reporting process.

Adoption

Those who believe there has been a breach of the data protection controls should raise their concerns as a security incident.

Employees who wilfully breach data protection controls may face disciplinary action.

Enforcement for suppliers should, align with local legislation and where possible be stipulated in contractual clauses.

Exemptions management

Time bound policy exemptions may be issued by the Policy Owner.

Glossary

Any specific words or phrases pertaining to the policy should be explained.

Term	Definition
GDPR	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data
General Data Protection Principles (GDPR)	The principles set out by the GDPR and the UK GDPR aiming to protect personal data, being: <ul style="list-style-type: none"> • Lawfulness, fairness and transparency • Purpose limitation • Data minimisation • Accuracy • Storage limitation • Integrity and confidentiality (security) • Accountability
Personal data	Information related to natural persons who: <ul style="list-style-type: none"> • can be identified or who are identifiable, directly from the information in question; or who can be indirectly identified from that information in combination with other information.
Sensitive personal data	Special categories of personal data, being: <ul style="list-style-type: none"> • racial or ethnic origin • political opinions • religious or philosophical beliefs • membership of a trade union • genetic data • biometric data • health • sex life or sexual orientation • criminal activity
UK GDPR	The United Kingdom General Data Protection Regulation as set out in the Data Protection Act 2018 (as amended)