

Our current position: General Data Protect Regulation (GDPR)

March 2018

1. Introduction

You may have seen GDPR (the General Data Protection Regulation) in the news, or maybe you've even started to get emails about it from your bank and other organisations, but do you know what it is, what it means for you and how it will impact on what we do with your data?

GDPR is the biggest change to UK data privacy law in 20 years, and to make sure we're GDPR ready we're reviewing how we manage all personal data, that's everything from your email address, telephone number and postal address to your preferences around how we communicate with you and any other personal details we might hold about you.

The purpose of GDPR is to give you, the individual, more control and visibility over the personal data an organisation holds.

We're making good progress preparing for the implementation of GDPR, which comes into force on 25 May 2018. This document outlines what we're doing and our commitment to protecting your data.

Key points covered:

- AAT's awareness of GDPR
- Data inventory
- What we do with personal data
- Notices and consent
- Your rights

2. AAT's awareness of GDPR

AAT acts as a data controller for prospects, member, employer, training provider and partner contact information, there may be times where we're also a data processor if we're processing information on behalf of our partners.

We have a dedicated team in place working on preparing us for GDPR. We've completed a period of gap analysis of GDPR requirements against an assurance framework, mapping these to our current activities. We're now reviewing current arrangements to make sure our processes and activities are robust and in line with GDPR requirements.

We're working to ensure the processes implemented to make us GDPR compliant are sustainable for the future. We take all the responsibilities under GDPR very seriously and the protection of our member and customer data has always been and will continue to be, a priority for us.

3. Data Inventory

As part of our GDPR transformation process, we're reviewing our existing data inventory and storage processes. We're carrying out a mapping exercise to identify where we process and document personal data. The intention is to create a streamlined, more efficient approach for the storage of all personal data.

4. What we do with personal data

The types of information we process are names, email addresses, postal addresses, job titles, social media contacts, telephone numbers, employer details, training provider details and ethical and sensitive information, such as disabilities, nationalities and payment details.

As part of our GDPR transformation, we're identifying all flows into and from AAT, across customers, suppliers and partners where personal data is transferred. We'll be enhancing our control processes and contractual agreements around each of these activities to ensure they are GDPR compliant.

The personal information we hold is stored electronically and used to perform the activities and processes needed to service our members and customers, in accordance with their permission. Where necessary, for the completion of certain processes, communication activities and/or legal obligations we may share personal information with third parties, based on consent received from the individuals and in accordance with data protection regulations.

Under GDPR we'll be ensuring that any third parties we share personal information with are also GDPR compliant. We'll be enhancing our data privacy framework as part of our GDPR transformation work. As an AAT customer, you may also be required to review your communication preferences and reconfirm consent for data sharing.

5. Notices and consent

We're currently reviewing our policies and other relevant notices in light of the requirements under GDPR. Where necessary these will be updated to reflect the new requirements of GDPR and will be published on our website. Below is a list of policies that are being reviewed and updated:

Data Security Policy	Data Protection Impact Assessment (DPIA)
Privacy Policy	Further Processing Policy
Cookie Policy	Records and Document Management Policy
Subject Access Request Policy	Data Retention Policy
Data Breach Policy	

We're also completing a review of our consent processes under legitimate and legal processing and will be updating our processes to ensure they are GDPR compliant.

Over the coming weeks, we may request that you update your consent to us using your data. But don't worry, you'll be able to change your mind in the future if you want to. Just because you might agree to us sending you something in the post now, we'll be making it easier for you to update your preferences, so if you no longer want to get post from us, but wish to still receive emails, you'll be able to update your communication preferences to reflect this.

6. Your rights

We take our responsibilities as a data controller very seriously. As part of our GDPR transformation process, we're reviewing our current procedures and controls, to make sure we have technological solutions to respond to requests for the following rights: erasure/to be forgotten, restrict processing, portability, objection and access.

In essence, we're working to ensure we have the right processes in place to make sure your data is in safe hand, more secure and better protected.

7. Summary

We do: use your personal data to help us provide you with a personalised service, so we can tailor the information we share with you, to ensure it's relevant, timely and useful.

We do: respect your privacy and your right to a choice, including a choice on when and how we contact you, along with your choice to be forgotten.

We don't: sell or share your details with third parties, unless you have given us consent to do so and or we have a legal obligation to do so.

We'll continue to review and update our privacy notices, so you can rest assured that we're going that extra mile to protect your data. We'll be updating our current Privacy Policy and our Cookies Policy within the next few months, so make sure you take a look at these on our website in May.

This document is intended to act as a formal response to enquiries about what we're doing to prepare for GDPR. The processing and storage of your personal data is of utmost importance to us, and we're working to make sure that our procedures are robust and efficient to ensure GDPR compliance and sustainability for the future.

If you have any further queries about how we're preparing for GDPR, please contact david.smith@aat.org.uk

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