

## GDPR Compliance Statement

### Introduction

The **EU General Data Protection Regulation ("GDPR")** came into force across the European Union on 25<sup>th</sup> May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21<sup>st</sup> Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

### Our Commitment

**Julia Nagle Conservation Ltd** (*'we' or 'us' or 'our'*) is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR and the UK's Data Protection Act.

**Julia Nagle Conservation Ltd** is dedicated to safeguarding the personal information under our remit and has developed a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

### How have we Prepared for the GDPR.

**Julia Nagle Conservation Ltd** has a consistent level of data protection and security across our organisation, these measures have been upgraded to include:

- **Information Audit** – a full company-wide information audit has identified and assessed what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.
- **Policies & Procedures** - protection policies and procedures meet the requirements and standards of the GDPR and any relevant data protection laws, including: -

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- **Data Protection** – our main procedures and documentation for data protection has been overhauled to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals and our clients.
- **Data Retention & Erasure** – we have updated our retention policy and schedule to ensure that we meet the ‘*data minimisation*’ and ‘*storage limitation*’ principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new ‘*Right to Erasure*’ obligation and are aware of when this and other data subject’s rights apply; along with any exemptions, response timeframes and notification responsibilities.
- **Data Breaches** – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.
- **Legal Basis for Processing** - we are reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
- **Privacy Notice/Policy** – we have revised our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- **Obtaining Consent** - we have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.
- **Processor Agreements** – where we use any third-party to process personal information on our behalf (*i.e. Payroll, Hosting etc*), we have checked for compliance and due diligence procedures for ensuring that they (*as well as we*), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organisational measures in place and compliance with the GDPR.

## **Data Subject Rights**

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy access information via Dropbox, our secure document repository, of an individual's right to access any personal information that **Julia Nagle Conservation Ltd** processes about them and to request information about: -

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has been disclosed
- How long we intend to store your personal data for
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (*where applicable*) or to restrict processing in accordance with data protection laws
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

## **Information Security & Technical and Organisational Measures**

**Julia Nagle Conservation Ltd** takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures, including:

- Password protection of all systems, spreadsheets and documentation repositories where personal data is stored. Access to these data is restricted to the directors of Julia Nagle Conservation Ltd
- Access to emails where personal data is stored is restricted to the directors of Julia Nagle Conservation Ltd only, via separate emails accounts. Access to which is password protected
- Third party access to personal data is by Haines and Watts, the Company accountants, and Government agencies only. Document sharing, where applicable, is only via a password protected secure portal. H&W have also undertaken a rigorous GDPR compliance process.
- Data related to Client artworks are maintained in password protected electronic format, with access restricted to authorised staff members and Company directors

## **GDPR Roles and Employees**

**Julia Nagle Conservation Ltd** have a designated data protection officer (DPO). The DPO is currently the director of business administration. He is responsible for promoting awareness of the GDPR across the organisation, assessing our GDPR needs, identifying any gap areas and implementing the new policies, procedures and measures.

**Julia Nagle Conservation Ltd** understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have ensured that our employees and contractors are fully briefed of our policies and procedures.

If you have any questions about our policies or procedures for the GDPR, please contact Claudio Capozzi, Data Protection Officer, via the studio.