

Idox Group Statement re Compliance with General Data Protection Regulation

1. Overview

Idox plc and its group companies have been preparing for the implementation of the EU General Data Protection Regulation's with a date for compliance as at 25 May 2018.

We support the GDPR accountability principle and understand we have an obligation to demonstrate compliance with the legislation's requirements.

2. GDPR Principles Governing Personal Data Processing

The six principles governing the processing of personal data under Article 5(1) of the GDPR are:

- 1) Lawfulness, fairness, and transparency.
- 2) Purpose limitation, which means that: an organisation should only collect personal data for specified, explicit, and legitimate purposes; and should not process the personal data in a manner that is incompatible with those purposes, except under limited circumstances.
- 3) Data minimisation, which means that personal data should be: adequate; relevant; and limited to what is necessary for the purpose of processing.
- 4) Accuracy, which means that personal data must be: accurate and kept up-to-date; and corrected or deleted without delay when inaccurate.
- 5) Storage limitation, which requires that the organisation keep personal data in identifiable form only for as long as necessary to fulfil the purposes the organisation collected it for, subject to limited exceptions.
- 6) Integrity and confidentiality, which requires that the organisation secure personal data by appropriate technical and organisational measures against unauthorized or unlawful processing, and against accidental loss, destruction, or damage.

Article 5 of the GDPR requires a data controller to both:

Comply with the six principles when processing personal data (Article 5(1), GDPR).

Demonstrate compliance with all six of the principles (see Accountability and Demonstrating Compliance) (Article 5(2), GDPR).

3. Accountability and Demonstrating Compliance

Idox Group, in their role as Data Controller, and as a Data Processor on behalf of our customers are mindful that we have a legal obligation to meet the accountability requirement.

We comply with the GDPR, on an ongoing basis, through evidence of:

- I. Internal policies and processes that comply with the GDPR's requirements.
- II. The implementation of the policies and processes into the organisation's activities.
- III. Effective internal compliance measures.
- IV. External controls.

Complying with the accountability principle requires the data controller to:

- I. Establish a data protection compliance program and privacy governance structure.
- II. Implement and maintain privacy controls on an ongoing basis.
- III. Embed ongoing privacy measures into corporate policies and day-to-day activities, throughout the organisation and within each business unit that processes personal data.
- IV. Leverage technology to require or ensure compliance.
- V. Maintain documentation of the privacy measures implemented and records of compliance
- VI. Train employees on privacy and data protection matters
- VII. Regularly test the privacy measures implemented.
- VIII. Use the results of testing, other audits, or metrics to demonstrate both existing and continuous compliance improvement efforts.

Idox plc and its group companies are committed to compliance with all aspects of GDPR and are working collaboratively with customers and suppliers to ensure we work in compliance with all laws.

4. Contractual Status

Customers may request changes to terms and conditions of their contract in light of the implementation of GDPR. Each of these requests will be reviewed in line with change control procedures within those contracts. We are committed to compliance with GDPR but given the volume of requests at this time it may not be possible to agree contractual changes ahead of May 2018.