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## GDPR Policy Statement for Xicon Customers

Xicon are committed to achieving and maintaining high standards of security and data privacy protection as required by The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) and any laws that replace, extend, re-enact, consolidate or amend it from time to time.

The GDPR gives enhanced protection for Personal Data and imposes stricter obligations on those who process it. The new obligations include:

- When their Personal Data is collected, individuals must be given more information about how it will be used through enhanced privacy notices
- Individuals have stronger rights to have their Personal Data rectified, erased and/or provided to them. As a result the systems used by organisations must be able to honour those rights

Xicon acts as the Data Processor and the Customer acts as the Data Controller and both parties must comply at all times with the requirements of the GDPR

The Personal Data is the property of the Customer

### Definitions

**Data Controller** determines the purposes and means of processing personal data

**Data Processor** is responsible for processing personal data on behalf of the Data Controller

**Data Processing** means processing activities carried out by Xicon on behalf of our Customers and includes collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, backup, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Data (whether or not by automated means) etc.

**Personal Data** means any information relating to an identifiable person who can be directly identified in particular by reference to an identifier. Personal data that has been pseudonymised can fall within the GDPR depending on how difficult it is to attribute the pseudonym to a particular individual.

**Special Categories of Personal Data** include racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data

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### **Xicon's GDPR responsibilities**

We have ensured compliance by:

- Updating our Customer contracts to include the subject matter and duration of processing, the nature and purpose of processing, the type of personal data and categories of data subjects and the obligations and rights of the Data Controller and the Data Processor
- Reviewing and updating internal policies to ensure compliance with GDPR
- Reviewing the technical and organisational measures in place to ensure an appropriate level of security is in place for the processing of Personal Data on behalf of our Customers
- Reviewing our retention policies
- Reviewing our access policies to ensure that it is limited to specific circumstances and specific members of staff
- Introducing new Processes to drive improved customer interaction and consent management
- We do not transfer any Personal Data outside the UK

### **Xicon Employees**

Xicon have undertaken the following steps to help employees adapt to the GDPR.

- Awareness workshops and material to help employees fully understand GDPR, how it affects them and how they are responsible for demonstrating compliance.
- Introduction of a Data Privacy Impact Assessment to help employees with compliance when introducing a new policy, starting a new project or updating existing systems.
- Updated Software tools, to help measure and track GDPR compliance.

### **Customer GDPR responsibilities**

The Customer must comply with the requirements of the GDPR when using Xicon's Hosting, Support and Networking Services.

The Customer must ensure that all instructions given by it to Xicon are documented and in accordance with the GDPR

The Customer must comply at all times with Xicon's Acceptable Use Policy which forms part of its Customer contracts. This covers amongst other things security

### **Third Parties**

Xicon does not use any sub-processors. Were it to do so it would not do so without the prior written consent of its Customers and only under written contract.

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## **Security**

Xicon's existing security accreditations; ISO27001:2013, Cyber Essentials and Health and Social Care Information Centre's Information Governance Toolkit Publications show we are committed to achieving and maintaining high standards of security and data privacy protection.

## **Data Breach**

Xicon will notify its Customer promptly after becoming aware of a data breach

## **Data Protection Officer**

Xicon has appointed a Data Protection Officer. All queries and notifications regarding Data Protection and GDPR compliance should be directed to Tracy Robinson ([tracy.robinson@xicon.com](mailto:tracy.robinson@xicon.com): telephone 01925 240342)