

GDPR Compliance Statement – Interlynx Systems LLC

The EU General Data Protection Regulation (“GDPR”) came into force on 25 May 2018.

The new Regulation aims to standardise data protection laws and processing across the EU, giving people greater rights to access and control their personal information. From January 1 2021, we will process data in accordance with UK GDPR in line with Brexit.

Our Commitment

INTERLYNX is committed to ensuring protection of all personal information that we hold, and to provide and to protect all such data. We recognise our obligations in updating and expanding this program to meet the requirements of GDPR.

We are committed to the principles of the GDPR by adopting the concept of ‘data privacy by design’ within our business. We remain accountable by having policies and systems in place to ensure overall compliance to data protection regulations including the management of data subject rights requests. Our policies are regularly reviewed and updated, and our staff is periodically trained on data protection and security throughout the year.

Transparency, Fairness and Lawfulness:

We process data with data subjects’ interests in mind and ensure that we approach processing activities with transparency to maintain fairness in what we do. This way we can be sure that we are processing data lawfully. We have a robust process in place to allow us to deal efficiently with any access requests we may receive.

Data Integrity and Confidentiality:

We hold data on secure systems and we have dedicated personnel who protect our systems.

Data Minimisation and Data Storage:

We do not keep data for longer than is necessary and only keep data if there is a lawful basis which allows fair retention. When we do need to remove data from our possession, we do so by using industry approved standards so the disposal or anonymisation is thoroughly compliant.

Data Accuracy:

Keeping data accurate is very important to us and we train our staff to ensure they are maintaining data to a high quality standard and with all the facts available. If you wish to rectify any information we hold about you, you can contact us at info@interlynxsystems.com

How We Comply with GDPR

INTERLYNX has a consistent level of data protection and security across our organisation, but we have introduced new measures to ensure compliancy.

- **Policies and Procedures** — we have revised our data protection policies to meet the requirements and standards of the GDPR and any relevant data protection laws, including:
 - **Data Protection** - our main policy and procedure document for data protection is continuously reviewed and revised to meet the standards and requirements of the GDPR. Accountability measures are in place to ensure that we understand our obligations and responsibilities; with a dedicated focus on privacy and the rights of our customers and the data processed through the use of our systems.
 - **Data Retention and Erasure** – we regularly review and update 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 in accordance with our obligations. Data that we process is erased immediately after becoming unnecessary.
 - **International Data Transfers and Third-Party Disclosures** – when INTERLYNX stores or transfers personal information of EEA/EU citizens, we have robust procedures in place to secure the integrity of the data. Our procedures include a continual review of the countries with sufficient adequacy decisions, as well as binding rules, or standard contractual clauses for those countries without.

Data Subject Rights

We provide easy-to-access information via our website's Privacy Policy of any individual's right to access any personal information that INTERLYNX processes about them and to request information about:

- what personal data we hold about them
- the purposes of the processing
- the types of personal data concerned
- The parties who receive your data in the course of business
- how long we intend to store your personal data for
- if we did not collect the data directly the data subject, the source of the data
- the right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this (Right to Rectification)
- the right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us (Right to be Forgotten/Opt Out)
- the right to lodge a complaint or seek judicial remedy and who to contact in such instances

Information Security and Technical and Organisational Measures

INTERLYNX takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure 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. We utilise anonymisation practices to ensure data that can be anonymous is stored that way. You can see more about our security measures in our Privacy Policy.

GDPR Roles and Employees

INTERLYNX has designated Mrinal Sachdev as our designated contact to develop and implement our roadmap for complying with the UK and EU GDPR. Our staff is responsible for promoting awareness of the GDPR across the organisation, contributing towards our GDPR compliance, identifying any gap areas and implementing new policies, procedures and measures.

INTERLYNX understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in awareness and training material.

If you have any questions about our GDPR compliance policies, please contact info@interlynxsystems.com

Additional Information

This version was last updated and reviewed December 2020

We regularly review and monitor regulatory guidance for any industry changes which may impact our business operations or your rights and freedoms.

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