



GRS and the GDPR*/PECR**

(Privacy Impact Assessment)

REF: EU General Data Protection Regulation (2016/679)* and the Privacy & Electronic Communications (EC Directive) Regulations 2003**

The GRS E-file is comprised purely of B2B contacts within incorporated companies (Ltd, PLC, LLP, etc.) for direct marketing purposes by email, mail or phone carried out by, or on behalf of, our clients.

There is a clear and demonstrable low impact on the privacy of all these contacts when measured against GDPR Rectial 75 and our own 'GDPR funnel of liabilities' document: of the wide scope of data elements that can be legitimately generated, held and processed as part of any given organisation's day-to-day activities, only a very small proportion of it applies to us:

- 1) Data subjects are corporate contacts within incorporated legal entities only
- 2) The information held on the individuals themselves is limited to their name, job title/function and email address. Other data such as postal location, switchboard telephone, number of staff and business activity relate to the legal entity being the incorporated company itself
- 3) The only 'Bank account details' we hold are the 8-digit account numbers and 6-digit sort codes within our secure online banking facility, originating from invoices issued to us by vendors. As per point 2 above, these also relate to *business* accounts as opposed to private accounts
- 4) The only 'Purchase history' we hold is that generated by our client base for our own reference and is not released to any third parties
- 5) Both the E-file and our own client database are held on password protected PC media for both 'active' day-to-day processing and back-up formats with the latter stored in a combination safe
- 6) E-file data is now sent to clients by secure transfer only
- 7) E-file is released to established and trusted contract researchers in small batches for the sole purpose of essential validation and verification only
- 8) Once it is established that a data subject on our E-file has left their position/been replaced, their details are permanently removed
- 9) With just one Director having sole responsibility for all data processing matters, GRS has no inter-departmental issues to consider

We have always limited the number of user licences issued annually to prevent over-use of the database and protect the integrity of the data. Furthermore, it has always been standard policy to apply a pre-agreed limit to the scope of usage of each user.

Summarising the rate of repeat business over years from our E-file customers, the nominal unsubscribe rates they experience, the response rates and subsequent business generated by it and a notable absence of complaints, we believe that we can conclude with pride (but not complacency) our business process has been an overwhelmingly positive one for both the users and prospects contained within it.