

General Data Protection Regulations (GDPR) Policy

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THE GLOBAL CENTRE OF
EXCELLENCE FOR GLASS
IN R&D, INNOVATION AND TRAINING

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Introduction

As part of its social responsibility Glass Futures Limited (GFL) is committed to compliance with data protection laws. This Data Protection Policy applies to GFL and is based on internationally accepted, basic principles on data protection. Ensuring data protection is the foundation of trustworthy business relationships and the reputation of GFL.

The Data Protection Policy provides one of the necessary framework conditions for cross-border personal data transmission among GFL Members. It ensures the adequate level of data protection prescribed by the European Union General Data Protection Regulation (GDPR) and the national laws for cross-border data transmission, including in countries that do not yet have adequate data protection laws.

This document defines the overarching GFL Data Protection Policy statement it also describes the relevant security policy requirements that are applicable to all personnel. This policy provides assurance that internal operations are controlled and secure. Access to computing and network resources is governed by policies herein that ensure the availability, integrity and confidentiality of personal data and information.

This policy applies to all personal data processing by GFL. The policy governs personal information that is processed electronically, information that is initially processed in hard copy form with an intention to process it electronically as well as manual records.

The policies described in this document and the supporting standards were established to protect GFL, its resources and its personnel from the very real risks associated with the use of personal data.

It is the responsibility of all personnel at GFL – no matter what their status (employee, contractor, consultant, temporary, volunteer, intern, etc.) to follow the appropriate policies for the technologies they use and to be vigilant to prevent possible security threats.

Laws regulate personal data processing. In our business we will collect, store and process personal data about our employees, member and business partner employees and other individuals and we recognize the need to treat it in an appropriate and lawful manner.



Essential Foundation of Personal Data Processing

There are four main questions that need to be taken into consideration when processing personal data:

- What kind of personal data is processed: personal data or special category or sensitive personal data. Personal data means any information on a private individual where these are identifiable as concerning him/her. Conditions for personal data processing are defined in law. Special category or sensitive personal data is a specific category of personal data, which includes data categories that are sensitive in their nature and therefore subject to stricter conditions in processing. Note that in local laws there may be additional requirements for certain data categories
- What is the role of GFL when processing personal data: data controller or data processor? Personal data may be processed in two roles, data controller or data processor. If GFL is the entity that collects the personal data and determines the purposes for which, and the manner in which, any personal data is processed then GFL is the data controller. When acting as the data controller, GFL must comply with rules set in this Data Protection Policy. If GFL is processing the third-party personal data on the instructions of the data controller then GFL is the data processor. When acting as the data processor, processing must be done in accordance with Data Processor's instructions and this Policy.
- Is personal data transferred outside EU/EEA area? To transfer personal data to a country outside of the EU/EEA area, it is required that certain rules set by law are followed strictly. Therefore, to complete any transfers without complying with following requirements set by law and this Policy is not allowed at all.
- What are the law(s) applicable to the processing? GFL shall always process personal data in compliance with local laws. The local laws may contain more detailed or strict requirements than this policy. In case of conflict between local mandatory laws and this policy the local laws shall prevail. Before processing personal data, the data controller or the data processor shall ensure the compliance with local laws.



Principles for Data Controller

When GFL is acting as data controller, GFL undertakes to control and process data subject's personal data in compliance with the following eight privacy principles:

- **Transparent processing.** Data subjects will be provided with information on how their personal data is processed and for what purpose. The data subject must be told who the data controller is, who the data controller's representative is, the purpose for which the personal data is to be processed by GFL, and to whom and where the personal data may be disclosed or transferred. Local laws may require further information to be provided.
- **Finality & purpose limitation.** GFL will process personal data of a data subject only for specific, explicit, and legitimate purposes, and not process that personal data in a way that is not in compliance with the pre-defined purpose. If it becomes necessary to change the purpose for which the personal data is processed, the data subject must be informed of the new purpose before any processing occurs.
- **Lawful basis for processing.** Processing activities must always be based on specific basis allowed by law. Sensitive personal data can only be processed under strict conditions. GFL acting as the data controller shall be responsible to ensure that it shall always process personal data in compliance with local laws.
- **Data quality.** Personal data must be maintained to be as accurate and up to date as possible. If information is incorrect, misleading or is not accurate, steps should therefore be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards. Inaccurate data, which is no longer required or out-of-date data shall be destroyed.
- **Data subject's rights.** Data subjects have the right to obtain information on the processing, request access to any personal data held about them by a data controller, correct their personal data if it is not accurate or request deletion their personal data and raise objections regarding the processing in certain cases (such as direct marketing).
- **Security measures.** GFL will take all reasonable measures to ensure secure processing of personal data as set out in the IP Policy and supporting Security Procedures.
- **Data processor processing.** When GFL is acting as the data controller and personal data processing is outsourced to a third party data processor, GFL undertakes to ensure that the personal data provided to such third party is relevant and not excessive and that the data processor maintains an equivalent level of control over that personal data as GFL itself ensures.
- **Personal data transfer.** If GFL must transfer personal data outside of the European Economic Area, GFL ensures that the personal data shall be transferred lawfully.



Data Controller Instructions

Personal data processing must always be planned prior to commencement of processing. When GFL is acting as a data controller, the following information needs to be documented prior to collecting the personal data and commencing processing activities:

- Data controller. Define the entity or entities that act as data controllers.
- The person in charge and/or contact person and governance. Define responsible person(s) who are responsible for the processing in question and that all responsibilities under this Policy and applicable laws are followed. Define the governance regarding the personal data.
- The purpose for processing the personal data. Define the purpose for which personal data is collected. Define if personal data is processed by a third-party data processor on behalf of GFL.
- Collected personal data. Define personal data categories that are collected.
- Regular sources of information. Where/from whom personal data is obtained and on what ground. For instance: consent or provision of a law. Define the countries from which personal data is collected.
- Regular destinations of disclosed data. Describe if the data is transferred to countries outside the European Union or the European Economic Area.
- Internal disclosure of personal data. Define how personal data shall be disclosed internally within Nobia.
- The principles how the data file/register is secured. Asses the sensitivity of the personal data and data security risks related to processing.
- Management of personal data. Define how: long personal data will be held; personal data shall be deleted and that incorrect personal data is corrected.
- Data subject. Define how and when data subjects will be informed of the processing. Note that information must be done prior to collection of personal data and always in compliance with local laws. Define how data subject inspection right to personal data is arranged. Additional requirements may be required by local laws.



Data Processor Instructions

When GFL is acting as data processor processing personal data on behalf of third-party data controller, the following shall apply:

- GFL shall process personal data in accordance with applicable laws.
- GFL shall process personal data in accordance with data controller instructions.
- In personal data Transfers GFL shall follow the Transfer of Personal Data standards
- If not otherwise agreed with the members, GFL shall always at minimum take all reasonable measures to ensure a secure processing of personal data.

Richard Katz, Chief Executive Officer

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