



GDPR Policy Statement

This Policy lays out our legal responsibilities and obligations when handling, processing and managing our employees and customer data.

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1. Lawful, fair and transparent processing

ORN (int) LTD are required to process personal data in a lawful, fair and transparent manner

Lawful means all processing should be based on a legitimate purpose.

Fair means companies take responsibility and do not process data for any purpose other than the legitimate purposes.

Transparent means that companies must inform data subjects about the processing activities on their personal data.

2. Limitation of purpose, data and storage

ORN (int) LTD are expected to limit the processing, only collect data, which is necessary, and not keep personal data once the processing purpose is completed. This would effectively bring the following requirements:

Forbid processing of personal data outside the legitimate purpose for which the personal data was collected.

Mandate that no personal data, other than what is necessary, be requested.

Ask that personal data should be deleted once the legitimate purpose for which it was collected is fulfilled.

3. Data subject rights

The data subjects have been assigned the right to ask the company what information it has about them, and what the company does with this information. In addition, a data subject has the right to ask for correction, object to processing, lodge a complaint, or even ask for the deletion or transfer of his or her personal data.

4. Consent

As and when the company has the intent to process personal data beyond the legitimate purpose for which that data was collected, a clear and explicit consent must be asked from the data subject. Once collected, this consent must be documented, and the data subject is allowed to withdraw consent at any moment.

Also, for the processing of children's data, GDPR requires explicit consent of the parents (or guardian) if the child's age is under 16.

5. Personal data breaches

ORN (Int) LTD must maintain a Personal Data Breach Register and based on severity, the regulator and data subject should be informed within 72 hours of identifying the breach.

6. Privacy by Design

ORN (Int) LTD will incorporate organisational and technical mechanisms to protect personal data in the design of new systems and processes; that is, the privacy and protection aspects should be ensured by default.

7. Data Protection Impact Assessment

To estimate the impact of changes or new actions, a Data Protection Impact Assessment will be conducted when initiating a new project, change or product. The Data Protection Impact Assessment is a procedure that needs to be carried out when a significant change is introduced in the processing of personal data. This change could be a new process, or a change to an existing process that alters the way personal data is being processed.

8. Data transfers

The controller of personal data has the accountability to ensure that personal data is protected and GDPR requirements respected, even if processing is being done by a third party. This means controllers have the obligation to ensure the protection and privacy of personal data when that data is being transferred outside the company, to a third party and / or other entity within the same company.

9. Data Protection Officer

When there is a significant requirement to process personal data, ORN (Int) LTD will assign a Data Protection Officer. When assigned, the Data Protection Officer would have the responsibility of advising the company about compliance with GDPR requirements.

10. Awareness and training

ORN (Int) LTD will create awareness among employees about key GDPR requirements and conduct regular training / briefings to ensure that employees remain aware of their responsibilities regarding the protection of personal data and identification of personal data breaches as soon as possible.

Below is the link to the full government GDPR guide.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/711097/guide-to-the-general-data-protection-regulation-gdpr-1-0.pdf