



Perfect Data.

Committed to protecting the privacy  
of the personal data we maintain about  
our **clients, employees, and other individuals**



**MAY 15, 2018, LONDON, UK:** With the 25 May **General Data Protection Regulation (GDPR)** deadline fast approaching, SHC has spent a significant amount of effort implementing processes and procedures to comply with the legal obligations of GDPR, while maintaining full transparency with our clients, employees, and other individuals regarding the usage of their data.

To further demonstrate our commitment, SHC has appointed Randalyn Perry as our Data Protection Officer. Ms. Perry is fully committed to overseeing our Data Protection Program, in coordination with our pre-existing Privacy team that is led by our external Compliance Director, Hilary Fischer.

**Below, we've outlined the steps we have taken in order to protect your data privacy and ensure our compliance readiness:**

#### **Data Audit**

SHC conducted an organization-wide audit of our data assets, including documentation of such assets and noting the legal bases of processing for each. Where we are using Legitimate Interest as the legal bases of processing, we have completed Legitimate Interest Assessments and DPIAs (if required) for each applicable data asset.

#### **Contractual and Procedural Updates**

SHC has updated all Privacy related notices and policies, including our corporate, panel, and employee versions. We have also updated our IT Security Policy, Data Breach Response Policy, and Data Retention Guidelines to ensure compliance with the GDPR Framework. Our third-party contracts have been updated to include acknowledgement of and agreement to GDPR and Privacy Shield obligations with all suppliers who process EU data on our behalf.

Our Panel Related processes have been reviewed for compliance with the GDPR, including usability upgrades to our panelist facing platforms, updates to our registration procedures, and integration of specific processes related to the management of Subject Access Requests as part of our existing Panel Customer Service SOPs.

### **Technical Safeguards**

SHC has completed a holistic IT penetration of all systems, and reviewed third party hosting systems for GDPR Framework. Enhanced safeguards through management, operational and technical controls have been deployed as countermeasures to avoid, detect, counteract, and minimize security risks. SHC will continue to monitor its IT security program to insure security activities are providing appropriate support to the GDPR mission.

### **Registration with Regulatory Authorities**

SHC is a [certified participant](#) of the EU-US Privacy Shield Framework and is [registered](#) as a Data Controller with the Information Commissioner's Office in the United Kingdom.

### **Training and Awareness**

We are currently in the process of launching an e-learning GDPR training and certification program across our global team.

If you have any further questions, please contact Randalyn at [privacy@surveyhealthcare.com](mailto:privacy@surveyhealthcare.com).

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