

LAST UPDATED: 25 MAY 2018

Coffey International Development Limited – Preparation for GDPR

The General Data Protection Regulation (GDPR) became enforceable from 25 May 2018. This builds on existing requirements with the aim of enhancing our privacy and protecting us from the effects of data breaches in an increasingly data-driven world. We see it as a positive move as it gives individuals more control over who is holding and using their data. The main changes that GDPR brings are:

1. **Increased scope:** it affects all organisations operating within the EU, irrespective of where they are based.
2. **Increased penalties:** for data breaches and non-compliance with GDPR.
3. **Strengthening of understanding and consent:** must provide individuals with clear information before they share their data and make it easier to unsubscribe or remove themselves from databases.
4. **Easier access:** to personal data that is held by others.

Use and Control of Personal Data

We collect and process contact details of people and organisations enquiring about our business or wishing to work with us. This data is collected via our website, e-mail, or in person. We collect and process personal data of prospective and actual employees and consultants working directly for us or on our projects. As part of projects that are carried out on behalf of our clients, we collect and process in-country data to benchmark or analyse the effectiveness of delivery of development programmes.

For full details please see our Privacy Notice on our website which can be found [here](#)

How we have prepared for GDPR

We have carried out thorough risk assessments (and will continue to so) of our processes, policies, contractual documents, systems and Security as set out below:

1. **Policy updates:** we have reviewed our data protection policy, updated our privacy notices and cookie policy.
2. **Contract** we have reviewed and updated our contracts with our suppliers, consultants and employees to reinforce protection of data privacy. We have also requested our sub-contractors and those who process data on our behalf to confirm that they are compliant with the requirements of GDPR.
3. **System and equipment updates:**
 - a. **Data Usage:** we have completed a comprehensive data audit to ensure that we only collect data required by the business and will review our retained data regularly.
 - b. **Data Access, Portability & Deletion:** we will be introducing new features to allow authorised users to hard delete data so that Data Controllers can comply with their obligations to destroy data where there is no longer a justifiable reason to retain the data.
 - c. **Data Security:** our systems are Cyber Essentials accredited.
 - d. **Company Laptops:** most company laptops are now fully encrypted and we are in the process of encrypting the remainder.
 - e. **Data Centre Security Measures:** security is continuously reviewed, including over backups in the cloud and off-site and updated as new threats and new tools are identified.

If you have any questions, please contact us at DPCM@coffey.com.